

<p align="center"><b>London Borough of Hammersmith &amp; Fulham</b></p> <p align="center"><b>AUDIT AND PENSIONS COMMITTEE</b></p> <p align="center"><b>15 September 2020</b></p>	
<p align="center"><b>CORPORATE ANTI-FRAUD SERVICE END OF YEAR PERFORMANCE REPORT – 1 APRIL 2019 to 31 MARCH 2020</b></p>	
<p><b>Report of the Director of Finance</b></p>	
<p><b>Open Report</b></p>	
<p><b>Classification - For Information</b> <b>Key Decision: No</b></p>	
<p><b>Consultation</b></p>	
<p><b>Wards Affected: All</b></p>	
<p><b>Accountable Director:</b> David Hughes, Director of Audit, Fraud, Risk and Insurance</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 31 March 2020.
- 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 ensures the Council fulfils its statutory obligation under the Local Government Act 1972 to provide 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 31 March 2020, CAFS identified 104 positive outcomes, including 32 recovered tenancies. Fraud identified has a notational value of over £770,000 and is detailed in the following table.

Activity	2018/19		2019/20	
	Fraud proved	Notional Values (£'s)	Fraud proved	Notional Values (£'s)
Housing Fraud	18	126,800	6	3,000
Right to Buy	16	29,800	6	12,000
Advisory Reports (pro-active)	6	14,000	9	23,500
<b>Prevention subtotal</b>	<b>40</b>	<b>170,600</b>	<b>21</b>	<b>38,500</b>
Tenancy Fraud (Council and Registered Providers)	37	432,000	34	430,600
Internal Staff	5	20,500	10	64,000
High/Medium risk fraud (e.g. NNDR, Procurement, Blue Badge)	35	32,450	8	6,000
Low-risk fraud (e.g. Freedom passes, Council Tax SPD)	21	23,689	20	22,992
<b>Detection subtotal</b>	<b>98</b>	<b>508,639</b>	<b>72</b>	<b>523,592</b>
Fraud loss recoveries <i>[incl. Proceeds of Crime]</i>	4	33,581	10	197,695
Prosecution	2	58,300	1	15,000
Press releases and publicity	2	11,000	-	-
<b>Deterrence subtotal</b>	<b>8</b>	<b>102,881</b>	<b>11</b>	<b>212,695</b>
<b>Total</b>	<b>146</b>	<b>782,120</b>	<b>104</b>	<b>774,787</b>

- 1.6 Between 1 April 2019 to 31 March 2020, 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	114	104
New referrals received	192	Internal Staff	12	2
Closed investigations	175	High/Medium risk fraud	19	8
Positive outcomes	104	Low-risk fraud	26	15
Live cases as at 01/04/20	137	POCA	4	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 that were accepted under the Council's whistleblowing policy. Two have been closed, although one remains an ongoing investigation.

Allegation	Outcome	Case status
<b>2019/20</b>		
i. Contractor charges	Investigation remains ongoing	Closed
ii. Codes of conduct	Investigation remains ongoing	Ongoing
iii. Conflict of interest	No fraud found – recommendations made to improve controls	Closed

- 2.3 A further whistleblowing allegation was received regarding procurement. Following an initial fact-finding investigation, that found no corroborative evidence, the matter was closed having failed to meet the qualified disclosure criteria.

### 3. ANTI-FRAUD AND CORRUPTION STRATEGY

- 3.1 The Council's Anti-Fraud & Corruption Strategy covering 2019/20 was based on three key themes: Acknowledge, Prevent and Pursue, and aligned with the National Strategy.

- 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 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. For example, a series of tenancy checks on a large residential block or estate.
- 4.3 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.
- 4.4 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.
- 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.
  - 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.

- 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:

- An investigation into a former employee who had misused Council property was undertaken. A review of processes identified a control weakness and made recommendations to improve the fraud control environment. Although insufficient evidence was gathered to prove a criminal offence, the intelligence amassed as a result of the investigation was referred to the local police.
- A referral from Human Resources alleged that an employee might have failed to declare secondary employment and the potential conflicts of interest associated with this. 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 make a declaration when a second company was formed. The investigation report and evidence amassed by CAFS was presented at the subsequent disciplinary proceedings, which resulted in a dismissal.
- A whistleblowing referral raised concerns regarding the adopted processes of a service, with specific reference to data protection breaches and the falsifying of statistical records. The subsequent investigation found that an item of controlled stationery was not GDPR compliant, although no reportable data protection breaches had been made. No other evidence of wrongdoing was found.
- 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.
- A referral was received by CAFS, which raised concerns regarding a potential conflict of interest within a department whose activities included significant procurements. The investigation revealed that similar 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 for review and mitigation.

## 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 Between 1 April 2019 to 31 March 2020, CAFS successfully recovered 31 properties which were being misused. 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
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 Road	W12	2	Subletting	Property surrendered
Council	Hammersmith Grove	W6	1	Subletting	Property surrendered
F/Mosaic	Mellitis Street	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 Dunstons Road	W6	4	Subletting	Property surrendered
Council	Alex Gossip House	SW6	2	Abandonment	Property surrendered
Council	Banim St	W6	1	False identity	Property surrendered
Council	32 Richmond Way	W12	2	Succession	Property surrendered
Council	College Court	W6	2	Subletting	Court possession
Council	5 Althea Street	SW6	1	False docs	Court possession
Council	11 Pelham House	W14	2	Non-residency	Property surrendered
Council	47 Ellenborough House	W12	3	Abandonment	Property surrendered
Council	44 Lannoy Point	SW6	Studio	Non-residency	Property surrendered
Council	98 Phipps House	W12	2	Subletting	Property surrendered
Council	59 Mellitus Street	W12	2	Subletting	Property surrendered
Council	88 Fulham Court	SW6	1	Non-residency	Property surrendered
S/Bush H.G.	57a Vespan Road	W12	2	Non-residency	Property surrendered
Council	25 Grey House	W12	2	Subletting	Property surrendered
Council	56 Hartopp Point	SW6	2	Subletting	Property surrendered
Council	8 Hartopp Point	SW6	1	Subletting	Property surrendered
S/Bush H.G.	40b Hestercombe Avenue	SW6	1	Subletting	Property surrendered

- 5.9 Cases of note are detailed in Appendix 1.

## Right to Buy (RTB)

- 5.10 CAFS apply an enhanced fraud prevention process to all new RTB applications, including anti-money laundering questionnaires as well as financial and residential verification.
- 5.11 For the period 1 April 2019 to 31 March 2020, CAFS has successfully prevented six 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.
- 5.12 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.

### **National Fraud Initiative (NFI)**

- 5.13 A vital component of the anti-fraud and corruption strategy is making better use of information and technology.
- 5.14 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.
- 5.15 To date over 679 matches have been processed, 96 cases where fraud or error was identified (including correcting Council records), and 105 matches remain under review.
- 5.16 The tables below highlight the number of reports received from the NFI exercise and the outputs to date.

<b>Report Type</b>	<b>Number of Reports</b>	<b>Fraud &amp; error</b>	<b>Fraud &amp; error value*</b>
Blue Badges	4	55	£31,625
Parking Permits	11		
Council Tax Reduction Scheme	33		
Housing Benefit	19	36	£133,176
Pensions	13		
Housing Tenants	20		
Right to Buy	2		
Waiting List	4	5	£16,200
Personal Budgets	4		
Residential Care Homes	3		
Alcohol Licence	3		
Creditors	11		
Procurement	2		
	<b>129</b>	<b>96</b>	<b>£181,001</b>

\*notional values calculated by the Cabinet Office

- 5.17 It should be noted that these figures are not included in the table at para 1.5.

## **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 £197,695 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.

### **Local Government Access to Information Act – background papers used:**

None.

### **Appendices:**

Appendix 1 - Anti-Fraud Activity 1 April 2019 to 30 September 2019

## Anti-Fraud Activity 1 April 2019 to 30 September 2019

Source	Fraud Review	Details	Risk
Risk Review	<p><b>Council Tax Refunds</b></p> <p>Residents pay council tax a month (or sometimes a year) ahead. This means it's common for a resident to be in credit when they move home.</p> <p>A risk review was undertaken of the refund process to ensure adequate anti-fraud controls were deployed and functioning correctly.</p> <p>Perceived fraud risks included:</p> <ul style="list-style-type: none"> <li>• False requests for refunds</li> <li>• Insider fraud</li> </ul> <p>A data set consisting of quantitative and qualitative data were analysed to highlight any anomalies, patterns, trends and correlations within a sample of 364 Council Tax Refunds covering the period from November 2018 to September 2019.</p>	<p><b>Methodology</b></p> <p>A duplication analysis methodology was applied to identify the frequency of quantitative and qualitative values to recognise any correlations between Sort Codes, Account Numbers, Refund Names, Account Holder Names and Refunds.</p> <p>The data was then dissected, and the data range distribution was used to identify accounts which had received the highest values of council tax refund. A further cluster analysis was then conducted to identify and interrogate all accounts which had been refunded any amount over £1,000.00. A further study identified anomalies within the accounts were the Account Name, and Refund Name did not correspond.</p> <p><b>Findings</b></p> <p>A total of 32 cases were identified for further checking. This included nine instances where the Account Name and Refund Name did not correspond and three potential duplicate payments.</p> <p>In all instances, the possible anomalies were explained away, and confirmation of the approval/authorisation process verified.</p> <p><b>Anti-Fraud Controls</b></p> <p>Both preventative and detective controls were present and effective to ensure refunds were paid correctly. These included detailed procedures, step by step guides, segregation of duties, supervisory checking and managerial authorisation.</p>	<p><b>Fraud risk register</b></p> <p><b>LOW = 3</b></p> <p>Impact = Very low 1 [Very low financial loss, a small political risk with low media coverage; low reputational risk]</p> <p>Likelihood = Possible 3 [No occurrence in LBHF, but known incidents outside the organisation]</p>

## Anti-Fraud Activity 1 April 2019 to 30 September 2019

<p>Risk Review</p>	<p><b>Shared Service Fostering and Adoption Service</b></p> <p>The Shared Service Fostering and Adoption Service provide a range of temporary and permanent placements with Carers and adoptive families for children under the care of the local authority.</p> <p>CAFS review of this Service was prompted by a recent fraud case in Oxfordshire where a foster carer fraudulently obtained over £100,000 over five years. In the scam, the carer continued to pocket payments which were regularly paid to him and his partner for fostering children, despite the child having left the home.</p> <p>Although Internal Audit conducted an audit in April 2019, the purpose of this Risk Review was to focus solely on the detection and prevention controls.</p>	<p><b>Methodology</b></p> <p>A meeting was arranged with the Head of Service to walk through processes and to discuss existing controls, especially those that would prevent a similar fraud from occurring.</p> <p><b>Findings</b></p> <p>The Service undertakes monthly review meetings. This includes monthly meetings with Heads of Service and Finance, as well as an additional monthly meeting with Line Managers and Finance.</p> <p>These meetings enable a complete overview of all children who are currently in care and children who have moved. This review ensures the Service can identify potential overpayments that might arise due to changes in circumstance and intervene accordingly.</p> <p>Foster carers are visited by the Service every four weeks.</p> <p>An Annual Financial Review ensures evidence of school reports, financial statements including proof of income/expenditure and proof of residency are seen. If this information is not provided within a month, payments are ceased.</p> <p><b>Conclusion</b></p> <p>The review found that management had been alert to the risks of fraud and that they were taking appropriate actions to ensure that controls were in place to reduce overpayments and to prevent and detect fraud by carers and special guardians.</p>	<p><b>Fraud risk register</b></p> <p><b>Risk score</b></p> <p><b>Low = 9</b></p> <p>Impact = Medium 3 [Financial loss could reach £100k, political and reputational risk]</p> <p>Likelihood = Possible 3 [No occurrences in LBHF, but known incidents outside the organisation]</p>
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## Anti-Fraud Activity 1 April 2019 to 30 September 2019

Risk Review	<p><b>Electoral Registration: Canvassers</b></p> <p>Every year the Council's Electoral Registration Officer (ERO) has a legal duty to undertake a canvass of all households and produce a revised Register of Electors by 1 December.</p> <p>To meet that legal duty, the ERO employs a team of canvassers to assist with the annual revision of the Register of Electors. Canvassers are given training and a guide before any work being carried out. They are paid for completing deliveries of Household Enquiry Forms and visiting residents to gather information as to who lives in each household.</p> <p>CAFS review of this Service was to check compliance and ensure canvass staff had declared and claimed the correct hours worked.</p>	<p><b>Scope:</b> CAFS review of this Service was to check compliance and ensure canvass staff had declared and claimed the correct hours worked.</p> <p><b>Methodology:</b> Samples were selected from the 2018 canvass, and paperwork was checked to identify any possible discrepancies that might indicate false information had been tendered.</p> <p>Household Enquiry forms were checked, which show details of visits that were carried out, including date and time of visit, name and address of residents. These were compared to timesheets and the declared hours of work.</p> <p>Canvassers were also interviewed to clarify information where discrepancies were found.</p> <p><b>Findings:</b> Although some discrepancies were identified, no evidence suggested any intention to deceive or falsify records. When questioned, some canvassers explained that it was not always practical to complete times and date information while on resident's doorsteps, but instead completed these later on with estimated times.</p> <p><b>Conclusion:</b> CAFS were satisfied that canvass staff had declared and claimed the correct hours worked and that the findings of the review provided assurance of compliance.</p>	<p><b>Fraud risk register</b></p> <p><b>Risk score</b></p> <p><b>Risk score reduced</b></p> <p>↓</p> <p><b>Low = 9</b></p> <p>Impact = Medium 3 [Political and reputational risk]</p> <p>Likelihood = Possible 3 [Known occurrences]</p> <p><b>Previous:</b> Impact = Medium 3 and Likelihood = 4 possible. <b>Medium 12</b></p>
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## Anti-Fraud Activity 1 April 2019 to 30 September 2019

	Case Description
1.	<p><b>SUCCESSION FRAUD</b> – A succession application was received concerning a property in Richmond Way, W12. The request came from two brothers who claimed links to the deceased tenant.</p> <p>Enquiries found little evidence of the applicants ever living at the address as their main and principal home, and more sensitive enquires found that they had previously assaulted the tenant and that a restraining order was in place to protect the former tenant from harassment. This had been served on them to keep them away from the property.</p> <p>When investigators challenged the applicants, they agreed to surrender the property and return the keys immediately. Initially, they failed to fulfil this promise. But following further conversations, the keys to this two-bedroom property were handed to the housing officer and vacant possession was returned to the Council.</p>
2.	<p><b>HOUSING FRAUD</b> - A female contacted the Council, claiming she was destitute and needed assistance finding a new council property. Having been the private tenant of a property in Askew Crescent, W12, she told the Housing Department that her landlords had sought, and been granted, possession of the property on the grounds of rent arrears, thereby making her homeless.</p> <p>She disputed the rent arrears and provided Santander bank statements showing rental payments referenced "Faster Payments Rent Ref Askew Crescent". However, vigilant housing officers raised concerns regarding the authenticity of the bank statements and referred the matter to CAFS.</p> <p>Using powers under the Prevention of Social Housing Fraud Act, investigators approached Santander to verify the statements. They provided certified copies which clearly showed the statements, submitted in support of the homeless claim, were false.</p> <p>Charges were laid against the applicant, and a trial date was set for March 2019 at Isleworth Crown Court. However, the date was deferred to November 2019.</p> <p>Ahead of the start of the trial, the defendant's solicitors made representations to the court that she wanted to plead guilty. On Monday, 11 November 2019, she pleaded guilty to fraud by false representation.</p> <p>The defendant was sentenced to six months imprisonment, suspended for two years.</p>

## Anti-Fraud Activity 1 April 2019 to 30 September 2019

3.	<p><b>TENANCY FRAUD</b> – CAFS were alerted to possible fraud by the fire safety team during a review of Hartopp Point on the Aintree Estate. During their inspection regime, they had failed to find the tenant at home and had seen unknown tenants at the property.</p> <p>Initial checks on the address found several third parties had financial links, while the tenant was linked to another property in the borough where her mother lives. However, when that address was researched, it raised concerns regarding the mother's tenancy and a parallel investigation by CAFS recovered that address during the inquiry into Hartopp Point.</p> <p>As the investigation into Hartopp Point gathered momentum, the investigator found that the tenant had spent significant periods outside of the UK in the USA. Additionally, the various third parties that had financial links to Hartopp Point appeared to be subtenants.</p> <p>One former subtenant was traced and provided the investigator with a witness statement. A neighbour was also willing to provide information regarding the various subtenants they had seen coming and going.</p> <p>Using powers under the Prevention of Social Housing Fraud Act the tenant's bank statements were obtained and revealed payments referenced to property in the USA and this corroborated open source intelligence that suggested the subject owned two properties in the state of Nevada and another in California.</p> <p>The tenant was invited to attend an interview under caution but failed to respond. When the investigator tried to call the tenant, the officer noted the ringing tone sounded distinctly longer as is usual, which is commensurate with overseas calls, thereby suggesting the tenant remained out of the country.</p> <p>A possession order was served and progressed to court. The defendant failed to attend, and possession was awarded to the Council unchallenged in the tenant's absence. The eviction was implemented in October 2019.</p>
4.	<p><b>SINGLE PERSON DISCOUNT</b> – During a tenancy fraud investigation on a property in Norland House, W11, the investigation found the tenant was resident and that the suspicions of tenancy fraud were unfounded. However, the enquiries undertaken by CAFS ascertained that additional family members were resident at the property.</p> <p>This information contradicted with the Council Tax (CT) records where a single person discount had been claimed for several years. The new information obtained by CAFS was applied to the CT account, and a new bill was raised for an additional £693.02. An invoice was generated, and repayment is being made by the tenant to reduce and clear the debt.</p>

## Anti-Fraud Activity 1 April 2019 to 30 September 2019

<b>5.</b>	<p><b>TENANCY FRAUD</b> - Referral received from Shepherds Bush Housing Group asking for assistance in respect of a subletting allegation. They had received information that the tenant of a flat in Hestercombe Avenue, SW6, was no longer living at the property and may have moved.</p> <p>Initial checks revealed links between the tenant and the Doncaster area, and as when the investigator delved deeper into the linked address they discovered that the tenant was the joint owner of a three-bedroom terrace house in the Arksey area of Doncaster.</p> <p>When investigators visited the Hestercombe Avenue unannounced, they found a young man living at the property. He referred to the tenant by name and called her the “landlord”. He explained that he and his partner had been living at the property since the end of 2018. They found the property on the website SpareRoom and paid a deposit of £500 and then £1,000 per month. He confirmed he paid the landlord by bank transfer as she resides “somewhere up north”.</p> <p>A witness statement and documentary evidence were obtained from the subtenant and details passed to Shepherds Bush Housing Group who served notices seeking possession. An unlawful profit order for £5,000 was also served on the tenant to repay any of the profit she had obtained by subletting social housing.</p> <p>Shortly after the tenant approached Shepherds Bush Housing Group to settle the matter immediately, returning the key and making a compensation payment of £5,000.</p> <p>In return for CAFS assistance, Shepherds Bush Housing Group have awarded the Council nomination rights to a one-bedroom property. This can now be used to help those in need of support and assistance.</p>
<b>6.</b>	<p><b>TENANCY FRAUD</b> - Housing staff working to decant residents of Hartopp Point reported difficulties contacting a tenant, and during their work at the property had observed two men removing furniture from the property. When challenged, they explained the tenant was away but would be back soon.</p> <p>Initial checks by CAFS found that there was a distinct lack of financial activity linked to the tenant and when they undertook border checks they discovered the tenant had not been in the UK since 2017 when they travelled to Algeria.</p> <p>Further checks on the tenant’s children, including searches of the education system, showed that the children had not enrolled at any school in the UK, nor were they registered as home-schooled.</p> <p>Because of the evidence amassed, housing officers promptly served notices and obtained possession forthwith.</p>

## Anti-Fraud Activity 1 April 2019 to 30 September 2019

7.	<p><b>TENANCY FRAUD</b> – CAFS received a referral from the Education Department when the tenant of a flat on the White City Estate told them that her four children were all being home-schooled outside the UK, in Canada.</p> <p>Initial enquiries returned negative including no active credit for the tenant at the White City address. However, there were links for her sister to the address. Border checks showed the tenant had regularly travelled to Canada and stayed for long periods. Checks also revealed she held both a UK passport and a Canadian passport.</p> <p>Investigators visited the property unannounced and found the sister living there. She said she didn't know where the tenant was, possibly in Harlesden caring for her father, but that she had no way of contacting her.</p> <p>Notices seeking possession were served, and this prompted the tenant to contact officers who invited her to attend an interview. During the meeting, she denied subletting, denied passing the tenancy on to her sister and said she did not live in Canada.</p> <p>At the end of the interview, officers asked her to bring in both her passports so that they could inspect her travel. She agreed, but the following day she contacted the housing officer and terminated her tenancy to this two-bedroom flat forthwith.</p>
8.	<p><b>TENANCY FRAUD</b> - CAFS received an allegation from the area housing officer stating that neighbours who believed that the tenant had moved. Neighbours said the tenants of this two-bedroom flat on the White City Estate were living overseas.</p> <p>When investigators conducted unannounced visits to the property, they found unknown third parties resident at the flat although they were not willing to cooperate with our investigators.</p> <p>Searches were unable to locate the tenants elsewhere in the UK, but border checks found the tenants had left the UK and had not returned.</p> <p>A letter was sent to the address, arranging a notified visit to the property, and when officers arrived, they were greeted by the tenant's son who answered the door. The son explained that his father had gone to Portugal for a family emergency and would be returning soon. However, when officers said that he left the UK in 2014 and never returned, he had no response.</p> <p>Notices were served, and the case progressed to court where possession was awarded to the Council unchallenged.</p>

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<p><b>9.</b></p>	<p><b>BLUE BADGE FRAUD (Temporary employee)</b> – A temporary member of staff was found misusing her mother’s disabled blue badge to park her car in the vicinity of her workplace, Beavor Lane, W6.</p> <p>The employee’s response, when challenged, was that the badge had remained in her windscreen after driving her mother and she had left it there when she drove to work.</p> <p>The misuse is a criminal offence, and the case is currently being progressed through the criminal court although adjourned due to COVID19 pandemic. The employee’s contract has been ended.</p>
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