

London Borough of Hammersmith & Fulham

Report to: Audit Committee

Date: 27/11/2023

Subject: Corporate Anti-Fraud Service Half-Year Report – 1 April 2023 to 30 September 2023

Report of: David Hughes, Shared Services Director for Audit, Fraud, Risk and Insurance

Responsible Director: Director for Audit, Fraud, Risk and Insurance

Summary

The Council takes its responsibilities to protect the public purse very seriously and is committed to protecting the public funds it administers. This report provides an account of fraud-related activity during the first half of the financial year to minimise the risk of fraud, bribery and corruption occurring within and against the Council.

Work is undertaken by the Corporate Anti-Fraud Service (CAFS), providing a complete, professional counter-fraud and investigation service for fraud attempted or committed against the Council and reinforces the Council's commitment to preventing, detecting and deterring fraud and corruption.

For the period 1 April 2023 and 30 September 2023, the Council identified 235 positive outcomes. The fraud identified has a notional value of over £680,000.

Recommendation

1. For the Committee to note and comment on the report.
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Wards Affected: None

Our Values	Summary of how this report aligns to the H&F Priorities
Building shared prosperity	CAFS undertakes several proactive (preventative) and reactive (investigations) work across a wide range of Council services. Preventing and detecting fraud, and recovering money and assets obtained through fraud, protects vital frontline services for residents.
Creating a compassionate council	CAFS undertake both proactive (preventative) and reactive (investigations) counter-fraud activity across a wide range of Council services. Preventing and detecting fraud, and recovering money and assets obtained through fraud, protects vital frontline services which support vulnerable

	residents.
Doing things with local residents, not to them	CAFS engages with local residents and provides multiple reporting channels so that concerns about fraud against the Council can be reported and investigated.
Being ruthlessly financially efficient	CAFS supports the Council in its statutory obligation under Section 151 of the Local Government Act 1972 to ensure the protection of public funds and to have an effective system of preventing and detecting fraud and corruption.
Taking pride in H&F	CAFS works closely with a wide range of services to build fraud prevention into its processes. The service promotes its work, particularly successful outcomes achieved, demonstrating the Borough's commitment to tackling fraud.
Rising to the challenge of the climate and ecological emergency	CAFS seeks to ensure that the service supports the Council's aims and objectives around climate change and carbon reduction.

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Background Papers Used in Preparing This Report

None

1. INTRODUCTION

- 1.1. This report provides an account of fraud-related activity undertaken by the Corporate Anti-Fraud Service (CAFS) from 1 April 2023 to 30 September 2023 to minimise the risk of fraud, bribery and corruption occurring within and against the Council.
- 1.2. CAFS remains a shared service providing the Council with a complete, professional counter-fraud and investigation service for fraud attempted or committed against the Authority.
- 1.3. The report also details activity and performance against the Council's Anti-Fraud and Corruption Strategy to assess its effectiveness, highlights some of the current and emerging areas of fraud risk and provides an overview of the effectiveness of the Council's arrangements to minimise the risk of fraud.
- 1.4. Between 1 April 2023 and 30 September 2023, CAFS investigated 522 cases, including 78 new referrals, 211 Nation Fraud Initiative matches and concluded 269 investigations. A conclusion ranges from a successful prosecution,

through prevention activity to action that deters fraud or no further action where there is no case to answer.

1.5. The table below shows this activity and details the fraud types.

Activity	Cases	Fraud types	Closed	Live
Live cases as of 01/04/23	233	Tenancy & Housing cases	55	174
New referrals received	78	Internal Staff	4	12
NFI positive matches	211	NFI	190	21
Closed investigations (Positive outcome 235)	269	High/Medium risk fraud	16	19
		Low-risk fraud	3	7
Live cases as at 30/09/23	253	POCA	1	20

1.6. Between 1 April 2023 and 30 September 2023, the Council identified 235 positive outcomes. The fraud identified has a notional value of over £680,000, detailed in the following table. In comparison, notional values for the previous two half-years outturns were £443,000 and £331,000 respectively.

Activity	Fraud proved.	Notional Values (£'s)
Housing application fraud (<i>incl. tenancy correction</i>)	10	39,264
Right to Buy	11	160,050
Advisory Reports (pro-active)	-	-
Prevention subtotal	21	199,314
Tenancy Fraud (Council and Registered Providers)	12	238,205
Internal Staff	2	10,000
Business Grants and Interruption Fund (COVID support)		
High/Medium risk fraud (e.g. NNDR, Parking, Social Care)	8	12,458
Low-risk fraud (e.g. Freedom passes, Council Tax, SPD)	1	357
Detection subtotal	23	261,020
Proceeds of Crime (POCA)	1	19,710
Deterrence subtotal	1	19,710
National Fraud Initiative (Welfare benefit & CT cases)	190	201,056
Total	235	681,100

1.7. Notional values estimate the financial savings from counter-fraud work and reinforce the importance of tackling fraud head-on, particularly when every penny should be invested in delivering high-quality services to local people.

1.8. These values provide a good indicator of the financial benefits of counter-fraud work. In some instances, this will include savings attributed to preventative measures. However, not all the cause-and-effect of fraud can be financially valued, for example:

- Disruption to service delivery,
- Reputation damage and loss of public trust,
- Negative impact on the organisational culture, especially significant effect on staff morale, recruitment, and retention, or
- Damage to relationships with partners and stakeholders

1.9 Details of noteworthy cases are reported in Appendix 1.

2. WHISTLEBLOWING

2.1 The Council's whistleblowing policy continues to be the primary support route for staff reporting concerns.

2.2 Since April 2023, CAFS has received no new fraud referrals via the Council's whistleblowing policy. However, CAFS has supported colleagues in the Economy Department who received a Health and Safety referral currently under review.

2.3 Although the volume of whistleblowing is not high, the Council's whistleblowing policy provides an essential safeguard for those who speak out. It is an important strand of the Council's overall approach to risk management and protection against fraud.

3. ANTI-FRAUD AND CORRUPTION STRATEGY

3.1 The Council's Anti-Fraud & Corruption Strategy covering 2020/23 is based on five key themes: i) GOVERN, ii) ACKNOWLEDGE, iii) PREVENT, iv) PURSUE and v) PROTECT.

3.2 The Strategy, due for renewal at the end of this financial year, continues to drive the Council's fraud resilience and demonstrate its protection and stewardship of public funds.

3.3 This report is structured to demonstrate how work undertaken by the fraud service aligns and underpins these themes.

i) GOVERN

A robust framework of procedures and policies

3.4 This strategy element focuses on those charged with Governance and ensuring they support the counter-fraud activities by ensuring anti-fraud, bribery and corruption measures are embedded throughout the organisation.

3.5 To this effect, the Council has a robust framework of procedures and policies that supports the prevention, detection, and response to fraud within the Council. They promote a culture of transparency, accountability, and compliance, essential elements of an effective anti-fraud strategy.

3.6 The framework also deters potential fraudsters, demonstrating that there are established rules and consequences for fraudulent actions. They also provide clarity and consistency for the organisation, which reduces ambiguity and helps prevent unintentional or opportunistic fraud.

- 3.7 Policies and procedures also serve as a foundation for training programs. Employees must understand what constitutes fraud and how to prevent it, facilitated by well-documented guidelines.
- 3.8 CAFS regularly review and update anti-fraud policies to support and guide Council staff, ensure compliance with laws and regulations, and reflect evolving fraud threats and changing business conditions. Any material changes are presented to the Audit Committee for review and approval.

ii) ACKNOWLEDGE

- 4.1 The Strategy denotes that the Council needs to understand fraud risks and then demonstrate this by committing the proper support and appropriate resources for tackling fraud.

Committing support and resources to tackle fraud

- 4.2 A vital element of a counter-fraud strategy is the ability of an organisation to call upon competent, professionally trained officers to investigate suspected fraud.
- 4.3 All CAFS investigators are members of the Government Counter Fraud Profession (GCFP), which provides a professional structure with common standards and competencies for those in counter-fraud roles.
- 4.4 By identifying risks, CAFS ensure that resources have also been focused in key areas, as demonstrated by the work on tackling tenancy fraud. It has ensured that the Council has successfully recovered 12 units that can now be allocated to those in genuine need of assistance.

Fraud awareness training

- 4.5 Corporate Anti-Fraud Service (CAFS) delivered a Fraud Awareness training session to eight Tri-Borough Internal Audit Team members. The training included examples of fraud recently occurring at schools across the Borough, providing insight into potential fraud indicators.
- 4.6 Fraud awareness training is crucial for auditors, who play a vital role in detecting and preventing fraud. By receiving training on various types of fraud schemes, red flags, and investigative techniques, auditors can enhance their ability to identify potentially fraudulent activities during the audit process.
- 4.7 It equips auditors with the knowledge of common fraud risks and the techniques used to manipulate processes or circumvent controls. This knowledge helps auditors assess the adequacy of anti-fraud controls and make informed judgments about risks.
- 4.8 Furthermore, fraud awareness training enables auditors to understand the psychology behind fraudulent behaviour, including motives and rationalisations. This understanding helps auditors identify potential

vulnerabilities in culture or control environment that may contribute to fraudulent activities.

- 4.9 The sessions have helped auditors enhance their effectiveness in detecting and preventing fraud, ensuring they maintain professional scepticism, which is critical to their role.

Demonstrating that it has a robust anti-fraud response

- 4.10 Counter-fraud activity is reported to the Audit Committee twice yearly, detailing performance and action in line with the Anti-Fraud and Corruption Strategy.
- 4.11 CAFS reports on investigation outcomes, including successful detections, prevention activity, actions that deter fraud, or no further action where assurance is obtained that there is no case to answer.

iii) PREVENT

- 5.1 The "Prevent" element of the Strategy focuses on detection and prevention activities, a significant part of CAFS work. It highlights the importance of enhancing anti-fraud controls and processes. CAFS continues to provide anti-fraud advice and support across the organisation, including the Council's partners and contractors.
- 5.2 CAFS reminds staff and management of their responsibilities to prevent fraud and corruption and raises awareness through training that highlights fraud's risks and the consequences on the Council and the wider community.
- 5.3 CAFS offer bespoke fraud awareness training that helps employees better connect the training messages to their daily responsibilities. It also helps staff identify suspicious activity and feel empowered to act against potential fraud.

Corporate Investigations

- 5.4 Corporate investigations cover a wide range of different counter-fraud activities. The work in this area is varied and extends beyond counter-fraud investigations to incorporate activities contributing to the organisation's assurance framework.
- 5.5 Since 1 April 2023, corporate investigation work has included:

Voters Register	Vigilant Electoral Services officers became suspicious of several new applications to register from individuals with the same surname, similar forenames, and very similar date of birth for three different addresses in the Borough. Additionally, each application failed the identity verification checks conducted by Electoral Services, and they were asked to provide further proof of identity and addresses per the process. Two failed to reply, but four provided images of UK driving licenses and gas bills, passed to CAFS to investigate further. CAFS's initial review suggested the documents were false, and various checks
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	<p>against the residential addresses, including sophisticated IP address authentication and mobile phone checking, showed that none of the applicants were residents. Furthermore, CAFS checks revealed that four of the driving licenses were forgeries.</p> <p>The cases were referred to the Police, although it is unlikely anyone will be traced because the applicants were deemed fictitious. It was suspected that the purpose of the attempted false registration was to enable identities to be created linked to residential addresses to facilitate a longer-term intention to commit fraud against financial institutions such as banks and credit card companies.</p> <p>However, the vigilance of officers, robust verification controls, and the subsequent investigation work have all combined to ensure the false applications were identified and rejected, maintaining the integrity of the register.</p>
Employee Fraud	<p>A member of the public raised a concern with the Council that they had observed an LBHF liveried maintenance van parked on the drive of a house in Ealing and the operative working on the property.</p> <p>The information, including vehicle registration, enabled Client Repairs to identify who the van was allocated to. The area supervisor was tasked with going to Ealing. Once there, he found one of his operatives undertaking private work at the Ealing address.</p> <p>Once his actions were uncovered, the maintenance operative took sickness leave before suspension could be considered.</p> <p>CAFS was commissioned to investigate further and found five different addresses outside the Borough where the van had driven to during daytime hours when the operative was meant to be working in LBHF. However, before the investigation could be concluded, the operative resigned while CAFS was still gathering further evidence for the disciplinary process.</p> <p>When potential misconduct occurs, the Council will always consider whether disciplinary action should proceed regardless of a resignation. In this instance, the cost of further investigations and the impact on senior officers hearing the case meant it was not in the public interest to proceed, and the resignation was accepted.</p>
Agency worker	<p>Human resources were informed of a potential employee fraud when a team manager brought a concern about an agency worker to their attention.</p> <p>The temporary employee joined the Council through an agency in August. The manager soon became alert to rumours that this person was also working elsewhere. The manager raised the alarm with human resources, who asked CAFS to investigate.</p> <p>Their subsequent enquiries revealed that the employee was also undertaking agency work with another London council, where they had worked since March 2023. However, this employment was not disclosed to LBHF when they joined us.</p> <p>The team manager undertook a fact-finding interview with the employee per the Council's policy, but the employee terminated their position with immediate effect.</p>
Social Housing Decarbonisation Fund	<p>The Council successfully secured grant funding through the Social Housing Decarbonisation Fund, per our Net Zero Carbon goals.</p> <p>As part of the grant acceptance process, the Area Regeneration Team were</p>

	<p>required to submit a Fraud Risk assessment, which CAFS helped to complete.</p> <p>The grant will help to fund the retrofit works on 385 Council-owned and 85 leasehold properties. These retrofit works aim to improve resident comfort by creating warmer homes, combat the cost-of-living crisis by reducing energy bills, and join the efforts against climate change by reducing carbon emissions.</p> <p>CAFS identified and described the controls which mitigated the risk they had identified, recording how the controls mitigate the risk, and detailing any limitations of the mitigation.</p> <p>Many of the fraud risks suggested by the Department for Business, Energy and Industry Strategy (BEIS) had been mitigated due to the planning process. However, for completeness, these were recorded, reviewed and risk assessed.</p>
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Housing/Tenancy Fraud

- 5.6 Given the desperate shortage of affordable homes, demand for social housing continues to grow. It is an asset to the public and often a lifeline to the people it's meant for. Finding and stopping social housing fraud can rapidly reduce homelessness and poverty among families living in rented properties.
- 5.7 CAFS provides an investigative service to all aspects of housing, including requests for the succession or assignment of tenancies, allegations of subletting or other forms of tenancy breaches, and right-to-buy applications.
- 5.8 Between 1 April 2023 and 30 September 2023, CAFS successfully recovered 12 properties which were being misused. These have now been allocated or made available to those in genuine need of housing support within the community.
- 5.9 Where investigative actions result in the return of keys and vacant possession, the Council can obtain control without requiring lengthy and costly legal action, ensuring properties are promptly reallocated.
- 5.10 Full details of the successful investigation activity regarding social housing are detailed below:

Landlord	Location	Postcode	Size (bedrooms)	Reason for recovery	Outcome
Council	Fulham Court	SW6	1	Abandonment	Keys returned
Council	Sullivan Court	SW6	3	Abandonment	Court Possession
Council	St Stephen's Avenue	W12	2	Abandonment	Keys returned
Council	Lugard House	W12	1	Subletting	Keys returned
Council	Crefeld Close	W6	1	Abandonment	Keys returned
Council	Benbow Court	W6	2	Abandonment	Court Possession
Council	Stanlake Road	W12	1	Abandonment	Keys returned
Council	Barton Road	W14	1	Abandonment	Keys returned
Council	Minford Gardens	W14	4	Subletting	Keys returned
Council	Champlain House	W12	2	False succession	Court Possession
Council	Exhibition Close	W12	4	False succession	Court Possession
Council	Poynter House	W11	1	Abandonment	Court Possession

5.11 Details of noteworthy cases are reported in Appendix 1.

Right to Buy

5.12 CAFS support the right-to-buy process within prevention activities that check and review new applications. CAFS has devised a due diligence process that challenges tenants through a series of questions to ensure they fulfil the right-to-buy criteria.

5.13 Questions include confirmation of all individuals participating in the right-to-buy transaction, including financing the purchase. This information is required to ensure all parties reside at the property. On occasions, visits are required to verify the details provided and household compositions.

5.14 The right-to-buy checks are conducted to maintain the integrity and probity of the scheme. However, since 1 April 2023, this prevention process has led to the cancellation of eleven applications, including recovering a property when the checks identified a potential right-to-buy address being unlawfully sublet.

5.15 Details of noteworthy cases are reported in Appendix 1.

iv) PURSUE

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.

Collaborating across departmental, geographical and sectoral boundaries

6.2 Collaboration is one of the critical themes under the "Pursue" strategic objective. Local authorities can tackle fraud locally and across geographical boundaries by collaborating effectively.

6.3 CAFS continue to actively maintain the authorities' membership of the National Anti-Fraud Network (NAFN) and the London Borough of Fraud Investigators Group (LBFIG), with officers from CAFS sitting on the Executive Board of both bodies.

National Fraud Initiative

6.4 A vital component of the anti-fraud and corruption strategy is making better use of information and technology. To this effect, the Council participates in the biennial National Fraud Initiative (NFI), an electronic data-matching exercise coordinated by the Cabinet Office.

- 6.5 Over 1,200 public and private sector organisations participate in the NFI, including councils, the Police, hospitals, and nearly 100 private companies, all helping to identify potentially fraudulent claims and errors. The latest outcomes for the 2022/2023 NFI matching exercise are detailed below.
- 6.6 The 2022/2023 NFI exercise began with data collection in September 2022, followed by matches in March 2023. To date, the Council has scrutinised and closed over 360 matches. Outcomes to date are detailed below.

Matches	Fraud/Error	Amounts
Council Tenancy – non-residency CAFS investigation	1	£13,115
Common Housing Register – removed following CAFS investigation	9	£34,764
Housing Benefits – overpayments recorded by DWP	8	£75,690
Council Tax Replacement Scheme – change in circumstances	4	£5,838
Council Tax – SPD removed & adult non-deps	178	£119,528
	200	£248,935

V) PROTECT

Protecting the Authority and its' residents from fraud

- 7.1 This aspect of the Strategy covers counter-fraud activity to protect public funds, residents and the community from fraud and the Council from future scams.
- 7.2 In support of this, CAFS continue to provide an investigative capability for key stakeholders across the Borough. This is no more important than working with local housing associations to protect their stock from fraudulent misuse, ensuring affordable housing is available to those in the community who need it.
- 7.3 CAFS also remain an active National Anti-Fraud Network (NAFN) member. NAFN disseminate national fraud alerts, which are circulated by CAFS, to the appropriate departments. The early warning about possible future scams helps to ensure that CAFS can protect the Council against new and emerging fraud risks.

CONSULTATION

- 8.1 The report has been subject to consultation with the Strategic Leadership Team.

EQUALITY IMPLICATIONS

- 9.1 There are no equality implications arising from this report.

LEGAL IMPLICATIONS

- 10.1 A range of legislation governs the work of CAFS, including the Police and Criminal Evidence Act, the Criminal Procedures Investigation Act, the

Regulation of Investigatory Powers Act, the Fraud Act, the Prevention of Social Housing Fraud Act, the Proceeds of Crime Act, and Data Protect Act.

10.2 There are no particular legal implications arising from this report.

Implications verified by Grant Deg, Assistant Director, Legal Services on 8 November 2023.

FINANCIAL AND RESOURCES IMPLICATIONS

11.1 Resources required to deliver on the Council's Counter-Fraud Strategy are funded from the budget allocated to the Corporate Anti-fraud Service. There are no additional resource implications arising from this report. Successful investigations and prosecutions can lead to the recovery of Council assets and money required to protect frontline services.

Implications verified by Sukvinder Kalsi, Director of Finance, on 8 November 2023.

RISK MANAGEMENT

12.1 The delivery of the counter-fraud strategy and associated policies contribute to the management of fraud risks faced by the Council, with proactive exercises supporting managers to put effective counter-fraud and corruption controls in place in their systems and processes.

Implications verified by Jules Binney, Risk and Assurance Manager, on 8 November 2023.

List of Appendices:

Appendix 1 – Counter-fraud notable cases.

Case Description	
1.	<p>RIGHT TO BUY & TENANCY FRAUD – In October 2002, the Council accepted a homeless application from a man claiming to be a Kosovan national, and he was accepted as having priority needs for housing. The following year, he was granted a secure tenancy in a one-bedroom flat in Fulham Court, Fulham Road, SW6.</p> <p>Unbeknown to the Council, his leave to remain in the UK expired, his subsequent appeal was refused, and in 2008, he was deported, leaving his Fulham Court property. He should have informed the Council that he could no longer live in the UK. Instead, he continued claiming Housing Benefits for the address until October 2010. The individual then re-entered the country in 2013 as an Albanian national and admitted that he had initially entered the UK illegally under the guise of a Kosovan national. He was granted entry clearance and returned to the UK to continue his tenancy in 2014.</p> <p>During his deportation and re-entry, five years passed, and unknown persons lived there. However, this only came to light when he made a right-to-buy application. At this point, CAFS investigators conducted due diligence checks, and they began to find a series of discrepancies dating back to 2008 when he was initially deported.</p> <p>The investigators discovered he had sub-let and/or parted with possession of the property between 24 July 2008 and 10 October 2012 (during the period of his absence from the UK following deportation) without the consent of the Council. However, when he was interviewed under caution, he denied the allegations even though CAFS had gathered weight of evidence to show that several unknown individuals were listed on the utility bills, voter registration details, bank records and mobile phone data, all at the Fulham Court address.</p> <p>Shortly after the interview, the right-to-buy application was withdrawn, and after that, the keys were returned, and vacant possession was gained. A referral was made to DWP regarding benefit fraud, but on the barrister's advice, CAFS did not pursue criminal charges. However, the investigation had stopped tenancy fraud; it recovered a one-bedroom property and prevented a potential fraudulent right to buy.</p>
2.	<p>ABANDONMENT: This case arose from the National Fraud Initiative (NFI) data-matching exercise, which helps public sector organisations identify and prevent fraudulent activity. The NFI uses analytic techniques to compare data from different public bodies to identify anomalies that might suggest fraud or error. In this instance, the match suggested that the tenant of a one-bedroom flat in Barton Road, Baron's Court W14, was not resident but instead living in Fulham, just off Dawes Road, where she received DWP benefits.</p> <p>The tenant was visited at the Fulham address, where investigators questioned her and confirmed she had been living with her brother for the last six months. She admitted that she had no intention to return to the tenancy address and agreed to terminate her tenancy forthwith. She signed a statement confirming the above, completed a vacation notice and handed over keys to the property, which was brought back into the Council's possession in June 2023.</p>

<p>3.</p>	<p>SUCCESSION: The tenant of a three-bedroom flat in Sullivan Court, SW6, passed away, and her son applied for succession.</p> <p>Succession is a legal term used when a person takes over a tenancy when the tenant dies and relates to the statutory right of certain people to succeed in the tenancy. Sometimes, a qualifying family member can succeed if residing with the late tenant for 12 months before death.</p> <p>Details in the succession application contradicted a file note on the council tax account from the tenant's daughter advising that the property was empty and due to be returned to the Council. Her message was dated June, but a later note from the son, in October, advises that he was caring for the tenant and was staying at the property.</p> <p>Checks on the son revealed overseas travel to France. They showed him out of the country for most of the 12-month qualifying period before the death of his mother. Therefore, the applicant was interviewed and denied being out of the country. He provided documentation, including bank statements from a French bank and a letter to Lloyds bank inviting him to confirm where he lived for tax purposes. This suggested they had records of him living overseas.</p> <p>The interview was ended, but a complete review of the documents he provided raised additional questions, and a letter asking for further details was sent. In reply, he called the investigator and confessed to being in France for the qualifying period. In a subsequent interview, he accepted that he does not qualify for succession. The tenancy was terminated, and the Council recovered a valuable three-bedroom property.</p>
<p>4.</p>	<p>SUBLETTING: A housing officer covering the W12 area raised concerns about the illegal subletting of a Council property in Lugard House, Bloemfontein Road.</p> <p>CAFS's initial review of the allegation included finance checking, which linked the tenant to various addresses in Kent. In contrast, a study of Council data suggested that both the council tax bills and rent for the address were being paid by an unknown third party from a NatWest bank account. This same account was also responsible for paying utilities and the TV license.</p> <p>As the investigation progressed, the unknown third party was revealed to be the tenant's sister, the accounts in her married name.</p> <p>Using powers under the Proceeds of Crime Act, the investigator made more in-depth enquiries into the tenant's finances and found he had a Halifax Bank account, and the transactions on this account suggested the tenant was spending most of his time in Kent and rarely in west London.</p> <p>The tenant was invited to attend an interview, which he did with his sister. However, he refused to engage with officers even when he was shown the evidence. His sister tried to interject, but officers explained that the tenant needed to answer the questions. At the end of this no-comment interview, the investigators asked if they could go to the property for an inspection, but he finally answered them and refused.</p> <p>The officer began compiling court papers when, a few days after the interview, the tenant returned the keys to this one-bedroom property without any notification, giving vacant possession back to the Council.</p>

<p>5.</p>	<p>SUCCESSION: The Council received a statutory succession application for a four-bedroom property in the White City area. Following the tenant's death, her son applied to succeed the tenancy. However, the housing team suspected it was fraudulent because the son was not a resident at the tenanted address during the qualifying period.</p> <p>CAFS commenced enquiries and soon began compiling a case file of evidence contradicting the application. For example, the late tenant had only claimed benefits as the sole tenant and received a single-person discount. There was no record of the son on the voters' roll, and further interrogation of Council records found correspondence in which the late tenant stated that her son used the address for correspondence, but he did not live with her. Further information was gathered, and a complete file was passed to Legal, who commenced repossession action.</p> <p>The case was heard at Willesden County Court. The defendant failed to attend, and the judge granted the Council outright possession unchallenged, which was recovered via bailiffs in July 2023.</p>
<p>6.</p>	<p>SUCCESSION: Following the death of a tenant living in a two-bedroom flat in Champlain House, W12, the Council received a succession application. However, Housing colleagues were suspicious that the applicant had not been residing at the tenanted address fully during the qualifying period and had links to other properties in Sheffield.</p> <p>Initial enquiries by CAFS corroborated their suspicions, finding several links between the applicant and addresses in Sheffield, including ownership of a property there. The information was backed up by Sheffield City Council, who confirmed that the applicant was liable for council tax.</p> <p>The succession application was refused but appealed, and in a final attempt to convince LBHF, the applicant submitted a copy of an old application form for his three children to attend St John XXII Catholic primary school, claiming these children were all living with him and now attending this school. However, enquiries with St John XXII Catholic primary school confirmed no trace of the children. Still, additional checks found them all attending a primary school in Sheffield.</p> <p>The Council was granted possession, unchallenged at Willesden County Court, and eviction occurred in July 2023.</p>
<p>7.</p>	<p>ABANDONMENT: CAFS were sent a referral following from colleagues in the Gas Safety Team. They had undertaken a forced entry to a property in Poynter House, W11 and found that the gas was already capped. It had stayed the same since their last safety inspection, which also required a forced entry.</p> <p>CAFS commenced their enquiries by interrogating Council records and found correspondence from the tenant who claimed they were not always at home, spending all day at their elderly father's property.</p> <p>Additional information suggested the tenant had not lived at the address for some time. This was further confirmed when investigators obtained certified evidence of utility usage for the flat, including gas and electricity. The evidence was collated, eviction proceedings commenced, and the</p>

	property was recovered in July 2023.
8.	<p>SUCCESSION: CAFS received a referral from the Housing Team about a succession. The tenant of a two-bedroom flat in Benbow Court, SW6, passed away, and her son applied to succeed the tenancy. However, the Housing Team were suspicious of the circumstances when they discovered that the tenant died in Grenada, which alluded to her non-residency and a breach of tenancy before her death.</p> <p>CAFS undertook UK border agency checks, indicating that the late tenant travelled to Grenada and remained there for long periods. This evidenced that she spent more time overseas than in the UK. Therefore, it suggested the tenanted address was not a sole and principal home.</p> <p>The late tenant's pension was paid into her Barclays bank account, and the transactions did not show everyday transactions associated with someone residing in the United Kingdom and using their account regularly.</p> <p>Enquiries were also made to the Attorney General's Chambers of the Government of Grenada, and they confirmed her residency in Grenada.</p> <p>The Council commenced repossession action, culminating in a court hearing in April 2023, where the judge granted a possession order and awarded costs.</p>
9.	<p>NON-RESIDENCY: CAFS was contacted by immigration colleagues who wanted to enquire about a flat in Sharnbrook House where our tenant was alleged to have breached a deportation order.</p> <p>Immigration provided a photo of the subject's deportation order and a witness statement. The statement confirmed that the tenant had been deported by breached the order by re-entering the UK. His parents may have been living at the Sharnbrook House while our tenant was now living in Banbury, Oxfordshire.</p> <p>Based upon this new information, a Notice to Quit was served on the property, and Legal commenced repossession action. However, while awaiting a court hearing, the subject was arrested and charged by Thames Valley Police, who bailed him to an address in Banbury, Oxfordshire, reaffirming our case against the tenant's non-residency. The local Council also confirmed he was liable for Council Tax at the Banbury address.</p> <p>At trial, immigration officers were in attendance. This may have influenced the individual's decision to instruct his solicitors to accept a possession order, unchallenged, and vacate the tenancy address.</p> <p>The tenant was not seen in court during the court hearing, but the property has now been returned to the Council's possession.</p>