

London Borough of Hammersmith & Fulham

Report to: Audit Committee

Date: 9 December 2024

Subject: Corporate Anti-Fraud Service Half-Year Report – 1 April 2024 to 30 September 2024

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

Responsible Director: David Hughes, Shared Services 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 2024 and 30 September 2024, the Council identified 40 positive outcomes. The fraud identified has a notional value of over £400,000.

Recommendation

1. For the Committee to note and comment on the report.

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 2024 and 30 September 2024 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 2024 and 30 September 2024, CAFS investigated 608 cases, including 51 new referrals and concluded 361 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 tables below provide a breakdown of investigations, including fraud types encountered and reasons for case closure.

Activity	Cases	Fraud types	Closed	Live
Live cases as of 01/04/24	557	Tenancy & Housing cases	28	181
New referrals accepted	39	Internal Staff	2	21
NFI positive matches (new)	12	NFI	317	-
Closed investigations (Positive outcome 40)	361	High/Medium risk fraud	4	15
		Low-risk fraud	9	6
Live cases as at 30/09/24	246	POCA	1	23

Reasons for cases closure	
Successful prosecution	1
Confiscation order	1
Disciplinary action	2
Property recovered	8
Positive outcomes other	28
Closed – not proved	12
Closed – genuine occupation	7
Closed – open in error	1
NFI data matching – <i>no fraud & false positives</i>	301
Closed	361

- 1.6. Between 1 April 2024 and 30 September 2024, the Council identified 40 positive outcomes. The fraud identified has a notional value of over £400,000, detailed in the following table.

Activity	Fraud proved.	Notional Values (£'s)
Housing application fraud (<i>incl. tenancy correction</i>)	-	0
Right to Buy	3	56,850
Advisory Reports (pro-active)	1	2,000
Prevention subtotal	4	58,850
Tenancy Fraud (Council and Registered Providers)	8	153,650
Internal Staff	2	10,000
High/Medium risk fraud (e.g. NNDR, Parking, Social Care)	7	45,389
Low-risk fraud (e.g. Freedom passes, Council Tax, SPD)	6	9,018
Detection subtotal	23	218,057
Proceeds of Crime (POCA)	1	83,020
Successful prosecution	1	23,000
Press release	1	2,000
Deterrence subtotal	3	108,020
National Fraud Initiative (Welfare benefit & CT cases)	10	21,748
Total	40	406,675

- 1.7. Notional values estimate the financial savings from counter-fraud work and reinforce the importance of tackling fraud head-on, particularly when all monies 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 2024, CAFS has received no new fraud referrals via the Council's whistleblowing policy although it remains 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 2024-2027 is based on four key themes: i) GOVERN, ii) UNDERSTAND, iii) PREVENT, iv) RESPOND.

3.2 The Strategy continues to drive the Council's fraud resilience and demonstrate its protection and stewardship of public funds. This report is structured to demonstrate how work undertaken by the fraud service aligns and underpins to themes of the Strategy.

i) GOVERN

A robust framework of procedures and policies

4.1 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.

4.2 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.

4.3 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.

4.4 Policies and procedures also serve as a foundation for training programs. Employees must understand what constitutes fraud, how to identify it, how to communicate instances of fraud to the correct teams and how to prevent it. This is supported by well-documented and communicated guidelines.

- 4.5 CAFS regularly review and update anti-fraud policies to support and guide Council staff, ensure compliance with laws and regulations, as well as to reflect evolving fraud threats and changing business conditions. Any material changes are presented to the Audit Committee for review and approval.

ii) UNDERSTAND

- 5.1 The Strategy denotes that the Council needs to understand how fraud, bribery and corruption impact the organisation and then mitigate the associated fraud risks by committing the proper support and assign appropriate resources for tackling fraud.

Committing support and resources to tackle fraud

- 5.2 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.
- 5.3 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.

Demonstrating that it has a robust anti-fraud response

- 5.4 Counter-fraud activity is reported to the Audit Committee biannually , detailing performance and action in line with the Anti-Fraud and Corruption Strategy.
- 5.5 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 requirement to answer.

iii) PREVENT

- 6.1 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.
- 6.2 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.
- 6.3 CAFS create fraud awareness training tailored to specific departments and roles enabling participants to better connect fraud risks with their daily responsibilities. This increases their confidence to voice their concerns or challenge instances of potential fraud.

iv) RESPOND

7.1 Stopping fraud and corruption from happening in the first place is our primary aim. However, it is recognised that individuals attempt to circumvent anti-fraud measures may ultimately succeed. It is therefore essential that a robust enforcement response is available to detect fraud, pursue fraudsters, prosecute them and as a result deter others from trying.

Corporate Investigations

7.2 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.

7.3 Since 1 April 2024, corporate investigation work has included:

<p>Disabled parking</p>	<p>A staff member was reported for improperly using a Blue Badge to park to attend work. On street checks found the vehicle parked close to their place of work, with a tabard featuring LBHF branding visible in the back seat.</p> <p>The Blue Badge holder was identified, and it linked them to a suspect that worked for the Council. The employee's shift pattern was reviewed, and an operation was set up to intercept him as he returned to the vehicle. On the day of the operation, an officer approached a man at the vehicle who identified themselves and admitted they were a Council employee. The officer issued a caution and seized the badge.</p> <p>When interviewed the employee admitted using the badge, which belonged to his mother, and acknowledged that displaying the Blue Badge exempted him from parking fees even though he was not the badge holder.</p> <p>After a disciplinary hearing, the employee was dismissed.</p>
<p>Secondary employment</p>	<p>An NFI data match linked an employee to a position at Transport for London (TFL). This match revealed that the employee was working 35 hours per week at TFL while also working 20 hours per week for LBHF.</p> <p>The employee held a grade that permits secondary employment, and an investigation showed that he had requested a reduction in hours at LBHF prior to starting at TFL. However, he cited childcare as the reason for the change in hours instead of mentioning his secondary job at TFL.</p> <p>During the investigation, the employee's timesheets were examined, and there were no conflicts between his LBHF hours and TFL shifts. On two occasions, LBHF shifts were adjusted to fit around TFL work, but there was no evidence of any misconduct.</p> <p>The employee received a warning for not disclosing the secondary employment, but no further action was taken.</p>

Housing/Tenancy Fraud

7.4 Given the shortage of affordable homes, demand for social housing continues to grow. It is an asset to the public and often a lifeline to the residents who require it. Detecting and stopping social housing fraud can help alleviate some

of the strain on the Council's housing resources thereby freeing up homes for those who need them.

- 7.5 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.
- 7.6 Between 1 April 2024 to 30 September 2024, CAFS successfully recovered eight properties which were being misused. These have now been allocated or made available to those in genuine need of housing support within the community.
- 7.7 Full details of the successful investigation activity regarding social housing are detailed below:

P/Code	Size (bedrooms)	Reason for recovery	Outcome	Notional value
SW6	3	False succession	Court possession	£29,800.00
SW6	Studio	Subletting	Keys returned	£14,050.00
W11	1	Subletting	Keys returned	£14,050.00
W14	1	Subletting	Keys returned	£14,050.00
W6	1	Abandonment	Keys returned	£14,050.00
W12	1	Abandonment	Keys returned	£14,050.00
SW6	3	Non residency	Keys returned	£30,800.00
W12	2	Non residency	Keys returned	£22,800.00

- 7.8 In addition to the eight successfully recovered properties, there are an additional ten cases where possession has been awarded, but we are awaiting eviction. There are also 16 more cases due to be heard in court. The table below highlights the pending cases where there are realistic prospects of property recovery.

Pending eviction	10
Tenancy fraud cases pending court hearing	16
Legal case conferences	3
	29

- 7.9 The duration for the cases mentioned above can differ, but typically, the Council may experience a wait of six months or longer to secure a court date for a repossession hearing. Eviction processes are usually quicker but can follow a similar timeline, because they are influenced by the availability of bailiffs and the scheduling organised by the courts.
- 7.10 In an effort to minimise waiting periods, the Council's Director of Legal Services convened a meeting with the Court Manager at Wandsworth County Court to discuss the challenges faced and to investigate potential solutions for expediting LBHF cases. The Director also reached out to Central London County Court for assistance; however, they indicated that they were unable to accommodate additional cases.

Right to Buy

- 7.11 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.
- 7.12 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.
- 7.13 The right-to-buy checks are conducted to maintain the integrity and probity of the scheme. Since 1 April 2024, this prevention process has led to the cancellation of three applications where CAFS enquiries identified anomalies or led to withdrawals.
- 7.14 These inquiries frequently uncover additional irregularities that aid in fraud prevention. For instance, a recent joint application from a married couple conflicted with a single person discount associated with the same address. After conducting checks, the discount was revoked, and the property received an updated Council Tax bill reflecting the full amount, with the £308 single person discount eliminated.

National Fraud Initiative

- 7.15 A vital component of the anti-fraud and corruption strategy is the continued use of technology to tackle fraud. To this effect, the Council participates in the biennial National Fraud Initiative (NFI), an electronic data-matching exercise coordinated by the Cabinet Office.
- 7.16 The 2022/2023 NFI exercise began with data collection in September 2022, followed by matches in March 2023. In the last financial year, the Council scrutinised and closed over 360 matches and identified fraud and error valued at £248,935.
- 7.17 Since April 2024 the Council has been closing off the 22/23 matches in ready for the next exercise starting in September 2024. Most of these matches were deemed low risk and classified as "no fraud" after review. However, 12 new cases of fraud and error were identified during this final phase of the exercise, as outlined in the table below.

Matches	Fraud/Error	Amounts
Payroll to Payroll	1	£2,500
Student Loans – HB overpayment created	7	£17,317
CTRS to HB at other Councils – CTRS/HB overpayment created	3	£4,430
Parking Permit to Parking Permit other Councils	1	£625
	12	£24,872

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 specific legal implications arising from this report.

Implications verified by Grant Deg, Director, Legal Services on 12/11/24

FINANCIAL AND RESOURCES IMPLICATIONS

11.1 The resources necessary for implementing the Council's Counter-Fraud Strategy are financed through the budget designated for the Corporate Anti-fraud Service. This report does not introduce any additional resource requirements. Effective investigations and prosecutions may result in the recovery of Council assets and funds essential for safeguarding frontline services.

Implications verified by Sukvinder Kalsi, Director of Finance, on 12/11/24.

RISK MANAGEMENT

12.1 The implementation of the counter-fraud strategy and the associated policies assists in managing the fraud risks encountered by the Council. Proactive measures support managers in establishing effective anti-fraud and corruption controls within their systems and processes.

Implications verified by Jules Binney, Risk and Assurance Manager, on 12/11/24.

List of Appendices:

Appendix 1 – Counter-fraud notable cases.

	Case Description
1.	<p>SUCCESSFUL PROSECUTION: An investigation began in 2019 when maintenance workers at Lannoy Point, SW6, expressed concerns about a tenant's residency, who had also applied for the right to buy. Officers discovered that all communications were being routed through international phone numbers or the tenant's relatives.</p> <p>CAFS initiated inquiries, but when a decision was made to demolish Lannoy Point and redevelop the Aintree Estate, a man showed up at the first resident engagement meeting claiming to live in the tenant's flat. He was not the actual tenant but presented a tenancy agreement, stating that his landlord resided overseas. This tenancy led investigators to a letting agency in Fulham Broadway, where it was revealed that the tenant's brother-in-law had contacted them to rent out the Lannoy Point address.</p> <p>The tenant was invited to an interview under caution where he claimed he had no knowledge of the sub-letting. He shifted the blame to his brother-in-law and stated that Housing staff were aware of his absences from the property. However, when pressed, he could not specify when he had been away, when he left the UK, or when he returned. When confronted with the fact that he had been out of the UK for nearly three years, he chose to end the interview.</p> <p>The investigator continued the investigation and, through a European Investigation Order authorised by Westminster Magistrates' Court, collaborated with Belgian police to gather evidence from an airline regarding the tenant's travel dates to the UK from Angola via Belgium. This investigation also uncovered the use of two other airlines, and when all the information was compiled, it showed that the tenant had only spent about 34 days in the UK between 2014 and 2019. In view of the evidence that was amassing the Council initiated criminal proceedings against the tenant, although progress was hindered by the pandemic and the subsequent decant of tenants from Lannoy Point in preparation for the redevelopment of Aintree Estate. Ultimately, the case was presented at Isleworth Crown Court in April 2024.</p> <p>During the trial, the tenant maintained his innocence, claiming to the court that he had given the keys to Lannoy Point to his sister and was unaware of any sub-letting. However, evidence showed that his sister had been depositing money into his bank account. Without these deposits, the tenant would not have had enough funds to cover his rent and council tax. The court heard the tenant's travel records, which indicated he spent only 34 days in the UK from 2014 to 2019. He stayed in hotels during his visits, not at Lannoy Point. One of these stays was at the Premier Inn in Hammersmith, which contradicted his claim of being on a spiritual retreat.</p> <p>The jury found him guilty on two counts of fraud: fraud by false representation and fraud by failing to disclose information.</p> <p>Sentencing was scheduled for July 2024, with the tenant receiving a two-year prison sentence, suspended for two years. He was ordered to complete 200 hours of community service within a year and adhere to a curfew from 8 PM to 5 AM for three months, monitored by an electronic tag. Additionally, he is required to pay LBHF £18,000 at a rate of £500 per month starting in September 2024.</p>

<p>2.</p>	<p>SUCCESSION: Following the death of a tenant living in Clem Atlee Court, her son applied for succession.</p> <p>Succession, in the context of tenancy, is a legal process that allows certain individuals to take over a tenancy when the tenant dies. It grants the right to succeed the tenancy to specific individuals, such as qualifying family members who have been living with the deceased tenant for at least 12 months prior to their death.</p> <p>In this matter, the investigation found an alternative address for the son in Kensington. The collation of evidence, including council tax records and tenancy agreements, proved that the son was not residing with his late mother 12 months before her death and did not qualify for succession.</p> <p>A notice to quit the address was served, but the son failed to comply, and the matter was referred to court. The son contested the findings, and the case was listed for a civil hearing. However, at court, he decided not to contest the matter, and a possession order was granted by the judge, and bailiffs completed the eviction. This provided LBHF with a valuable three-bedroom property that can now be allocated to a family in need of support.</p>
<p>3.</p>	<p>RIGHT-TO-BUY (RTB): CAFS plays a crucial role in the RTB process by incorporating it into their prevention efforts, which include thorough examination and assessment of new applications. The evaluations carried out by CAFS uphold the honesty and integrity of the scheme.</p> <p>A recent RTB application submitted by a couple residing in Field Road, W6, raised suspicions as one of the applicants was found to be associated with their mother's address. Upon closer inspection, it was revealed that they did not fulfil the residency requirement.</p> <p>When asked to provide evidence of uninterrupted residency, they decided to retract their application.</p>
<p>4.</p>	<p>RESIDENT PERMIT: The NFI data match revealed that a resident possessed two parking permits for the same vehicle, one in Brighton and the other in Burnfoot Avenue, SW6.</p> <p>A review of council records showed that the resident was an owner occupier but not the individual holding a resident permit at the address. A financial check showed the permit holder held a financial history in LBHF, but there have been no active accounts since 2022, and that since then all records linked to Brighton.</p> <p>While conducting investigations in the vicinity, officers undertook a visit to Burnfoot Avenue for completeness, where the owner of the property was found at home. He confirmed that the permit holder had previously rented the property from him but had moved out approximately a year ago and is no longer a resident.</p> <p>To ensure our records were updated and to prevent any further loss of parking revenue due to the use of an unlawfully obtained permit, the permit was immediately cancelled.</p>

5.	<p>SUBLETTING: During the NFI data matching exercise, a case was initially flagged for potential abandonment at an address on the Edward Woods Estate and investigators visited to confirm the tenant's residency. Upon arrival, a man answered the door and stated that the tenant was not present. He mentioned that he knew the tenant as Sam, not by the name registered with the council.</p> <p>Investigators continued questioning and the man explained that he occupied the bedroom while the tenant resided in the living room. When asked about the number of occupants, he indicated that it was just the two of them. He also pointed out women's shoes in the hallway, belonging to the tenant's wife who had supposedly relocated overseas, but he was unsure of the exact country. The man informed that the tenant was at work and usually returned home after 6 pm, adding that the tenant frequently visited his wife abroad. He disclosed that he had been living at the property for 3 months and paid rent solely for the room.</p> <p>The visit prompted further inquiries into the tenancy, leading to the collection of the tenant's NatWest bank statements as evidence. The statements revealed transactions in the Merton area of south-west London, indicating a consistent rental income of £650 per month, which had gradually increased to £850 per month.</p> <p>The tenant was invited to an interview which he attended and evidence suggesting potential subletting was presented to him. Although he acknowledged having a lodger, he denied subletting the entire property, asserting that he continued to reside there. When investigators proposed accompanying him back to the property to verify residency, he declined the offer. At the conclusion of the meeting, he was provided with a Vacation Notice Form to consider terminating the tenancy, and it was suggested that he should seek legal advice.</p> <p>A few days later, the tenant contacted to confirm that he had signed the Vacation Notice Form and expressed his intention to vacate the property.</p>
6.	<p>DIRECT PAYMENTS (PERSONAL BUDGETS): A referral was received from Direct Payments concerning a deceased service user. The daughter of the deceased client reported the death, but this notification occurred 18 months ago, during which Direct Payments continued without interruption.</p> <p>The investigation uncovered that a different sister was overseeing her mother's direct payments and was depositing the funds into her own account. Production orders were secured to review the accounts, revealing that the Direct Payments were being spent long after the mother's passing.</p> <p>Further investigations regarding the sister indicated that pursuing legal action was not in the public interest. Instead, every effort was directed towards recovering the overpaid funds.</p> <p>The total identified overpayment is £32,320.98. After discussions, an agreement was drafted and signed by this sister, and a monthly direct debit was set up, with the first monthly payment of £540 being collected in August 2024.</p>

7.	<p>COUNCIL TAX: Following the passing of a tenant in College Park and Old Oak Ward, the Council updated its records, which included the termination of any welfare benefits and transferring the council tax bill to the Executors' name. However, a bereaved family member reached out to the landlords, Peabody, to take over the tenancy, claiming they had been living with the tenant up until their death.</p> <p>CAFS collaborates with all housing associations within LBHF, and when Peabody made a data protection request to CAFS to verify the relative's residency, the CAFS investigator identified that the Council's council tax records also needed correction. By working together with Peabody, accurate information regarding the residents of the property and unknown information regarding the household composition was obtained. This led to the issuing of a revised council tax bill, ensuring the correct amount of council tax (£2,737.54) was being recovered.</p>
8.	<p>SUBLETTING: A referral was received from colleagues within the Supported Moves Team. They had tried to decant a resident in Baron's Court to conduct maintenance work but were unable to speak with the tenant. There was however someone else at the property who said the tenant was in Ireland.</p> <p>The investigator began efforts to track down the tenant, uncovering multiple reports of the tenant's criminal activities in Westminster, Norfolk, and Essex. These reports included information about prison sentences, prompting the investigator to reach out to the probationary services for assistance.</p> <p>The Probation Service had information on him living in Paddington and Kentish Town, with the latter being the last known address associated with the tenant. This was verified when the investigator conducted checks on financial records.</p> <p>Contact was established with the tenant at this address, leading to a scheduled meeting at the residence in Baron's Court, where both the tenant and another individual were present. Upon questioning about his residency, it became evident that the tenant had no personal belongings at the property and could not provide evidence of living there, claiming that all bills were under his friend's name.</p> <p>The tenant was invited to an interview under caution which he attended, but he soon terminated the interview before investigators could put all their questions to him. He said he wouldn't be attending another interview, but before the case could be progressed via Legal Services, the tenancy was terminated, and keys returned.</p>