

London Borough of Hammersmith & Fulham

Report to: Audit Committee

Date: 09 June 2025

Subject: Corporate Anti-Fraud Service Annual Report – 1 April 2024 to 31 March 2025

Report of: David Hughes, Director of 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 undertaken during the financial year 2024/25 to minimise the risk of fraud, bribery and corruption occurring within and against the Council.

The Corporate Anti-Fraud Service (CAFS) provides a complete, professional counter-fraud and investigation service for fraud attempted or committed against the Council. It demonstrates the Council's commitment to preventing, detecting, and discouraging fraud and corruption.

The Council identified 112 positive outcomes from 1 April 2024 to 31 March 2025. The fraud identified has a notional value of over £780,000. A further £384,000 was identified for recovery via confiscation orders granted at court under the Proceeds of Crime Act.

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 carries out a variety of proactive measures aimed at prevention and reactive investigations, covering a diverse range of services provided by the Council. By actively preventing and uncovering fraudulent activities and recovering money and assets obtained through fraud, CAFS ensures the safeguarding of essential frontline services for the benefit of residents.
Creating a compassionate council	CAFS undertake proactive (preventative) and reactive (investigations) counter-fraud activity across various Council services. By preventing and detecting fraud and recovering fraud

Our Values	Summary of how this report aligns to the H&F Priorities
	loss, it protects vital frontline services and contributes to establishing a caring council.
Doing things with local residents, not to them	CAFS engages with 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 collaborates with a wide range of services to integrate fraud prevention measures into its operations. 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 to 31 March 2025 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 31 March 2025, the Council processed 92 new referrals and concluded 441 investigations. Conclusions varied from successful

prosecutions to preventative measures, actions to deter fraud, or no further action if no wrongdoing was found. Out of the concluded cases, 112 resulted in positive outcomes related to preventing, detecting, or recovering fraud loss.

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	557	Tenancy & Housing cases	70	153
New referrals received	92	Internal Staff	8	17
NFI investigated matches	17	NFI	288	11
Closed investigations. (Positive outcome 112)	441	High/Medium risk fraud	11	11
		Low-risk fraud	54	13
Live cases as of 31/03/24	225	POCA	10	20

1.6 The 112 positive outcomes identified have a notional value of over £780,000, detailed in the following table. Additionally, £384,000 was identified for recovery via confiscation orders granted at court under the Proceeds of Crime Act.

Activity	Fraud proved.	Notional Values (£'s)
Housing application fraud	1	3,000
Right to Buy	5	94,750
Advisory Reports	2	8,000
Prevention subtotal	8	105,750
Tenancy Fraud	27	477,100
Internal Staff	4	21,370
High/Medium risk fraud (e.g. NNDR, Parking, Social Care)	5	46,262
Low-risk fraud (e.g. Freedom passes, Council Tax, SPD)	32	34,474
Detection subtotal	68	579,206
Criminal Prosecution	1	23,000
Press Release	1	2,000
Deterrence subtotal	2	25,000
National Fraud Initiative (fraud & error)	24	73,671
Total	102	783,627
Recovery activity		
Proceeds of Crime (POCA)	10	384,296

1.7 Calculating notional values helps quantify the financial benefits of counter-fraud efforts, highlighting savings from preventive actions or recovery through the Proceeds of Crime Act. However, not all fraud impacts can be measured monetarily, such as:

- Service disruption,
- Reputation damage and loss of trust,
- Impact on organisational culture and staff morale, recruitment, retention,
- Damage to relationships with partners and stakeholders.

- 1.8 Investing wisely in counter-fraud measures is crucial for delivering high-quality services to residents.

2. WHISTLEBLOWING

- 2.1 The Council's whistleblowing policy encourages and protects employees who report suspected wrongdoing or malpractice within the Council, especially when it involves a potential public interest. It provides a safe and confidential process for raising concerns, ensuring that whistleblowers are protected from retaliation and that the reported issues are appropriately investigated.
- 2.2 Since 1 April 2024, CAFS has not received any new fraud referrals through the Council's whistleblowing policy. Nevertheless, in many cases, staff do not need to use the whistleblowing route or the protection of the Public Interest Disclosure Act 1998 to raise their concerns. Employees have consistently reported potential fraud throughout the year through other means, such as the CAFS hotline or investigation mailbox. For instance, numerous tenancy fraud cases that lead to property recovery often begin with referrals from housing officers.
- 2.3 In addition to referring cases of potential fraud, colleagues regularly approach CAFS for advice and guidance on anti-fraud controls or best practices for fraud prevention.

3. EMERGING ISSUES

- 3.1 This section informs members about new fraud types, emerging trends, or risks.

Economic Crime and Corporate Transparency Act 2023

- 3.2 The Economic Crime and Corporate Transparency Act 2023 (ECCTA) is aimed at strengthening the UK's ability to combat economic crime, including fraud, money laundering, and terrorist financing, and to enhance transparency around corporate entities.
- 3.3 While the Act is now law, not all changes will take effect immediately. They will be rolled out gradually under a government implementation timetable. This includes the new Failure to Prevent Fraud offence, which will come into effect on 1 September 2025.
- 3.4 Under the new offence, an organisation will be liable when an employee or agent commits a fraud offence for the organisation's benefit and the organisation does not have reasonable fraud prevention procedures in place.
- 3.5 Government guidance acknowledges that most public sector bodies are likely to have many of the elements of the fraud prevention framework already in place. However, CAFS is currently undertaking a risk assessment of the existing framework to ensure it is adequate as well as updating and reviewing existing policies and procedures.

- 3.6 In doing so, CAFS will follow the six principles of compliance laid out in the Government's guidance accompanying the new offence. Top-level commitment; Risk Assessment; Proportional procedures; Due diligence; Communication (including whistleblowing) and training; Monitoring, and review.

4. ANTI-FRAUD AND CORRUPTION STRATEGY

- 4.1 The new Anti-Fraud & Corruption Strategy 2024/27 commenced on 1 April 2024. It aims to drive the counter-fraud activity by using technology to increase proactive operations and collaborative work while remaining sufficiently agile to anticipate changing environments.
- 4.2 The Strategy is built on four pillars: Govern, Understand, Prevent, and Respond. This yearend report has been structured to demonstrate how counter-fraud activity has aligned with that Strategy throughout 2024/25.

i) GOVERN

- 4.3 This strategic element emphasises the importance of governance in supporting counter-fraud activities by embedding anti-fraud, bribery, and corruption measures throughout the organisation.

Commitment to integrity

- 4.4 The Council has established a comprehensive framework of procedures and policies that supports the prevention, detection, and response to fraud within the Council.
- 4.5 This framework promotes a culture of transparency, accountability, and compliance, which is essential to an effective anti-fraud strategy. Global controls include the governance structure (as outlined in the constitution), the Contracts Assurance Board, the Corporate Revenue and Capital monitoring processes, and anti-bribery and anti-fraud policies.
- 4.6 Procedures are regularly reviewed, and internal controls are tested and assessed through the internal audit process to ensure their effectiveness in preventing or detecting fraud to the greatest extent possible.
- 4.7 The framework also serves as a deterrent to potential fraudsters, demonstrating established rules and consequences for fraudulent actions. It provides clarity and consistency for the organisation, reducing ambiguity and helping prevent unintentional or opportunistic fraud.

Evaluating the anti-fraud response

- 4.8 Counter-fraud activity is reported to the Audit Committee biannually, detailing performance and action in line with the Anti-Fraud and Corruption Strategy. This enables the Committee to review the effectiveness of the investigation process and the Anti-Fraud and Corruption Strategy.
- 4.9 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.

ii) UNDERSTAND

- 5.1 The Strategy denotes that the Council needs to understand how fraud, bribery, and corruption impact the organisation and mitigate the associated risks by providing proper support and assigning appropriate resources to tackle fraud.
- 5.2 The Council's comprehensive framework of anti-fraud policies and procedures forms the foundation for training programs. Employees must understand what constitutes fraud, how to identify it, how to report instances of fraud to the appropriate teams, and how to prevent it. This is supported by well-documented and communicated guidelines.

The financial impact of fraud

- 5.3 CAFS has conducted a loss measurement review to evaluate the financial impact of fraud and inform risk assessments. This effort created a compendium of fraud values to estimate the financial savings or identified fraud losses from various counter-fraud activities CAFS undertook. The compendium will assess fraud values starting on 1 April 2025.
- 5.4 In developing methodologies for calculating notional values, CAFS endeavoured to apply a fair value based on key advantages or benefits derived from counter-fraud actions or interventions. When actual figures are unavailable, proxy values or estimates drawn from historical data or broader organisational and sector insights have been utilised.
- 5.5 To ensure that the figures used by CAFS are meaningful, they have been compiled using methodologies aligned with the following principles.
- Linked to a detection or intervention activity—The prevention must be aligned with a CAFS action, detection, or intervention.
 - Evidence or research-based - The methodology applied needs to derive from research or historical data.
 - Logical method of calculation that is reasonable and proportionate - The values used need to derive from logical methodologies. They must also be reasonable and proportionate to the activity.
 - Relevant to the organisation - We must account for organisational and regional differences in our calculations.

5.6 Methodologies also take account of deterrence, which aims to neutralise fraudulent intent. Including:

- Communicating the consequences of offending (i.e. communications and press releases)
- Providing information on the fraud response and counter-fraud success, including detection and monitoring (i.e. Audit Committee Reports)
- Publishing the sanctions policy (framework of anti-fraud policies and procedures)
- Highlighting the impact that fraud and corruption have on the organisation (i.e. fraud awareness)

iii) PREVENT

6.1 The "Prevent" element of the Strategy focuses on taking action to avoid fraud losses. This involves using innovative data and proactive analysis to identify and implement fraud prevention measures and assessing existing controls against risks to recommend improvements where necessary.

Fraud Hub

6.2 The "Prevent" initiative aims to enhance fraud prevention by leveraging information, technology, and proactive data analysis. Therefore, the Council has joined the London NFI Fraud Hub, which offers a cost-effective solution for cross-boundary and internal data matching to identify fraud. It allows unlimited data uploads and generates real-time fraud matches as new data is submitted.

6.3 At the end of 2024, a dedicated investigation officer was appointed to manage the Hub, upload datasets, and investigate anomalies. The datasets include housing tenancies, waiting lists, resident parking, council tax reduction information and right to buy.

6.4 The first LBHF datasets were uploaded in January 2025, and over 2,550 outputs were generated for review in the last quarter of 2024/25. From these outputs, 98 records were cleansed and data corrected.

6.5 Cleansing data is crucial in the fight against fraud. It improves analytical accuracy, reducing the risk of missed fraudulent activities. The Hub analytic detection relies on spotting unusual patterns or anomalies which incorrect data can mask. Furthermore, clean data helps reduce the number of false alarms, allowing investigators to focus on genuine fraud cases instead of wasting time on errors caused by poor-quality data.

6.6 The matches also led to the discovery of an undisclosed tenant's death and the recovery of a one-bedroom property in Emlyn Gardens, W12. The housing officer contacted the next of kin, returned the keys, and voided the property.

This recovery alone has offset the Council's membership to the Hub and our share of the dedicated officer's cost for 2024/25.

National Fraud Initiative

- 6.7 In parallel with the Fraud Hub, the Council participates in the biennial National Fraud Initiative (NFI), an electronic data-matching exercise coordinated and sanctioned by the Cabinet Office.
- 6.8 Since April 2024, the Council has been closing off the 22/23 matches to prepare for the 24/25. After review, most of these matches were deemed low risk and classified as "no fraud." However, 12 new cases of fraud and error were identified during this final phase of the exercise, as outlined in the table below.

22/23 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

- 6.9 The 24/25 NFI exercise began with data collection in September 2024 and was followed by matches in February and March 2025.
- 6.10 In the short time since the matches were received 104 have been reviewed and closed, 37 cases have been referred for investigation and 12 cases of fraud and error have already been identified.

24/25 Matches	Fraud/Error	Amounts
Student Loans – HB overpayment created	9	£42,717
CTRS to HB at other Councils – CTRS/HB overpayment created	3	£6,082
	12	£48,799

Corporate Investigations

- 6.11 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.
- 6.12 Since 1 April 2024, corporate investigation work has included:

Investigation	Investigation summary
Disclosure and Barring Service – assurance work	<p>An anonymous report suggested that a particular department within the Council, which engages with vulnerable adults, may not have performed sufficient Disclosure and Barring Service (DBS) checks on its personnel.</p> <p>DBS checks are essential for employers to make informed hiring decisions, as they verify whether employees are listed on any barred lists concerning adults and children.</p> <p>In response to the allegations, CAFS was asked to investigate and conduct a review of all staff across the named department. This review confirmed that all</p>

Investigation	Investigation summary
	<p>necessary DBS checks had been completed and accurately recorded on internal systems.</p> <p>The investigation revealed that two DBS checks had lapsed; however, it was determined that these lapses were due to the staff members being on sick leave, which prevented management from reviewing their DBS status. Documentation was in place to ensure that these individuals would not resume their duties until new DBS checks were completed.</p> <p>No further action was required.</p>
Adult Social Care – assisting debt recovery	<p>The case was escalated from Adult Social Care due to concerns about Direct Payments being issued to a client's brother despite the client being placed in a 24-hour residential care facility.</p> <p>A personal budget represents the total expenditure for the care and support the local authority arranges or provides for a client. Direct payments enable a client or their representative to procure the necessary care and support services, granting the client autonomy over addressing their needs. In this situation, payments should have been terminated once the client entered residential care. However, an overpayment totalling £6,191.90 was identified, but efforts by colleagues from Adult Social Care to locate the brother or initiate recovery were unsuccessful.</p> <p>An investigation conducted by CAFS successfully identified the brother's residence and initiated discussions to arrange repayment. This process included providing a direct debit mandate form for his signature and establishing a repayment agreement, which has now been implemented, and recovery has commenced.</p>
Dual working – no fraud	<p>An internal investigation was conducted following a National Fraud Initiative (NFI) data match in March 2023, which connected one of our employees to a Transport for London (TFL) position. The data implied that the employee worked 35 hours per week at TFL while simultaneously working 20 hours per week for the London Borough of Hammersmith & Fulham (LBHF). The HR records found no declaration of secondary employment.</p> <p>However, the investigation found no evidence that the employee was manipulating records or providing inaccurate information on his timesheets. Furthermore, upon closer inspection, it was apparent that the two roles did not overlap. Analysing rotas and timesheets alongside TFL's login and building access records confirmed that the employee's LBHF shifts did not conflict with his TFL commitments.</p> <p>A report was submitted to HR, and the employee was warned for not disclosing secondary employment. Management will continue to oversee and monitor their work hours and schedules.</p>
CCTV site review	<p>Following damage incurred at a critical server responsible for a significant amount of CCTV, CAFS was asked to investigate and establish what or who had caused the damage.</p> <p>Investigations found record keeping and site management required attention, while the room containing the server was untidy and contained junk. Air vents in the outside wall were standard, requiring upgrades to prevent dust and debris.</p> <p>While verifying who might have caused the damage was impossible, the review was welcomed, and recommendations ensured that the appropriate improvements to the facilities could be implemented.</p>

Housing/Tenancy Fraud

- 6.13 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. Therefore, CAFS provides an investigative service for 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.
- 6.14 Between 1 April 2024 and 31 March 2025, CAFS successfully recovered 27 misused properties. These have now been allocated or made available to those in genuine need of housing support within the community.

Location	P/Code	Size (bedrooms)	Reason for recovery	Outcome	Notional value
Stafford Cripps House	SW6	3	Succession	Court Possession	£29,800
Chesilton Road	SW6	Studio	Subletting	Keys returned	£14,050
Stebbing House	W11	1	Subletting	Keys returned	£14,050
Baron's Court Road	W14	1	Subletting	Keys returned	£14,050
Riverside Gardens	W6	Studio	Abandonment	Keys returned	£14,050
Roseford Court	W12	1	Abandonment	Keys returned	£29,800
Strode Road	SW6	3	Non residency	Keys returned	£14,050
Shepherds Court	W12	2	Non residency	Keys returned	£14,050
Margaret Herbison House	SW6	2	Subletting	Keys returned	£14,050
Rosewood Square	W12	1	Subletting	Keys returned	£14,050
Roseford Court	W12	2	Subletting	Keys returned	£14,050
Lickey House	W14	1	Subletting	Court Possession	£30,800
Malabar Court	W12	1	Subletting	Keys returned	£22,800
Sharnbrook House	W14	1	Subletting	Keys returned	£22,800
Hayter House	W12	3	Subletting	Keys returned	£14,050
Burne Jones House	W14	1	Abandonment	Keys returned	£22,800
Fulham Court	SW6	1	Succession	Court Possession	£13,050
Tynemouth St	SW6	2	Subletting	Keys returned	£14,050
Overstone Road	W6	1	Succession	Court Possession	£14,050
Norland House	W11	Studio	Abandonment	Court Possession	£30,800
Hudson Close	W12	2	False statement	Keys returned	£14,050
Wardo Avenue	SW6	2	False statement	Keys returned	£13,050
Phipps House	W12	2	Subletting	Keys returned	£14,050
Fulham Court	SW6	1	Subletting	Keys returned	£13,050
Batoum Gardens	W6	1	Abandonment	Keys returned	£13,050
Agate Road	W6	1	Subletting	Keys returned	£22,800
Michael Stewart House	SW6	1	False statement	Keys returned	£22,800

Right to Buy

- 6.15 CAFS supports right-to-buy by reviewing new applications and performing due diligence to ensure tenants meet the criteria. They confirm all individuals involved and verify their residency, sometimes requiring visits.
- 6.16 These checks maintain the scheme's integrity and probity. Since 1 April 2024, this process has cancelled five applications due to identified anomalies or withdrawals during the review process.

iv) RESPOND

- 7.1 This element of the Strategy is about ensuring that the Council has the capability to respond to fraud. This means ensuring that the resources dedicated to combatting fraud are sufficient and have the right skills and abilities, as well as the Council imposing appropriate sanctions, including criminal and civil proceedings, and recovering losses when fraud is found.

Maintain a specialist investigative resource

- 7.2 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.
- 7.3 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.

Proceeds of Crime Act

- 7.4 Our primary aim must be to prevent fraud and corruption from occurring. However, those who keep on trying may still succeed. Therefore, a robust enforcement response is essential to pursue fraudsters and deter others.
- 7.5 Since April 2024, CAFS has used its Accredited Financial Investigator to recover fraud losses or secure Confiscation Orders in Crown Court, totalling over £380,000. This includes a joint investigation with trading standards that resulted in a confiscation order of over £105,000 for illegal online TV and film streaming and a £100,000 confiscation order at Isleworth Crown Court due to overcharging by a chimney-sweeping business.
- 7.6 For the year 2024/25, a total £59,000 has been recovered and CAFS are exploring the potential for temporary recruitment to enhance resources aimed at tackling tenancy fraud.

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 CAFS's work is governed by various legislation, 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 the Data Protection Act.

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

Implications verified by Grant Deg, Director of Legal Services, on 28 May 2025.

FINANCIAL AND RESOURCES IMPLICATIONS

11.1 Resources required to deliver on the Council's Anti-Fraud and Corruption Strategy are funded from the budget allocated to CAFS. 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 19 May 2025.

RISK MANAGEMENT

12.1 The Council's Anti-Fraud and Corruption Strategy and anti-fraud policies help manage the Council's fraud risks by assisting managers in implementing effective controls.

Implications verified by Moira Mackie, Head of Internal Audit on 19 May 2025.

List of Appendices:

Appendix 1 – Counter-fraud notable cases.

Case Description

- 1. TENANCY FRAUD (Subletting):** The rent team escalated a case to CAFS due to concerns regarding the residency of a Council tenant. The individual had been a tenant of a three-bedroom property on Strode Road, SW6, since 2011, following the death of their mother. However, the rent team was now concerned that they were subletting this address.

The investigation revealed that the tenant and their partner had a private rental agreement in East London, where they were responsible for council tax and utility payments until 2019. While no additional addresses for the subjects were discovered, financial records indicated transactions occurring in and around East London. Furthermore, these financial records included bank transfers from family members who seemed to reside at the Strode Road address, raising suspicions of possible unlawful rental payments.

CAFS investigators visited the Strode Road property multiple times, but the tenant was never located there. Family members consistently answered the door, claiming that the tenant was working shifts and recommended scheduling an appointment to meet them.

In June 2024, the tenant was invited for an interview under caution. They attended alone but asked to suspend the interview to seek legal advice after being presented with substantial evidence.

A few months later, the interview resumed with the tenant accompanied by legal representation. However, after reviewing the evidence, the solicitor submitted a prepared statement indicating that the tenant had chosen to surrender their tenancy, which was finalised the following month.
- 2. PROCEEDS OF CRIME ACT** - The case involved individuals conspiring to supply illegal online TV and film streaming on a large scale, particularly focusing on Premier League football broadcasts. The revenue generated by these illegal broadcasts had been acquired and concealed, contrary to The Proceeds of Crime Act 2002.

The original investigation revealed that unauthorised streaming was being provided through a specific website. Test purchases indicated that subscribers were charged £10 monthly to access all major Sky Sports and BT Sports channels, along with other broadcasts, including Premier League football matches that were unavailable to UK viewers through legitimate UK broadcasters.

The investigation confirmed that no payments were made to SKY, BT, or any other rightful content holders for access to their material. A representative from the Premier League provided a witness statement affirming that the website lacked the authority to distribute such streams.

Among several defendants, this individual was identified as receiving payments totalling £111,000. Following a POCA hearing, a confiscation order of £105,014.66 was issued at Derby Crown Court in December 2024 and was later fulfilled through two separate payments to HMCTS.

Case Description

- 3. TENANCY FRAUD (Abandonment):** The Corporate Anti-Fraud Service (CAFS) received a referral from the gas safety team regarding the tenancy at Roseford Court, Shepherds Bush Green, W12. During an inspection, the gas safety team observed that the tenant was not residing at the property. They found rotten food items in the fridge and post addressed to other individuals.
- CAFS conducted extensive checks, including credit checks, travel checks, fob data analysis, property visits, land registry searches, and open-source investigations. Travel data indicated prolonged absences from the property, and intelligence suggested that the subject was living in Somalia.
- The subject was invited for an informal interview, during which partial evidence was presented. The subject was given the option to surrender the tenancy and informed that the matter could result in criminal action under the Prevention of Social Housing Fraud Act. They were advised to seek legal advice and given seven days to respond.
- The tenant contacted CAFS and agreed to surrender the tenancy in exchange for no further action. The subject's brother handed in the vacation notice, keys, and fobs. No further action was taken, and the property has now been relet to someone genuinely needing housing support.
- 4. TENANCY FRAUD (Non-residency):** The tenant was granted tenancy of a three-bedroom property at Shepherds Court, W12 in 1979. However, recent concerns regarding the tenant's location arose after a visit by the housing officer, during which her daughter indicated that the tenant was away.
- The subsequent investigation by CAFS revealed that the tenant's financial activities were mainly concentrated in the Surbiton and Kingston areas. Additional inquiries indicated that the tenant maintained some financial ties to the rented property.
- Initial worries were that the tenant, who was over 80 years old, might be living in a care home while her daughter was reportedly subletting the council property.
- CAFS made several unsuccessful attempts to visit the property until the daughter eventually opened the door. Upon questioning, she acknowledged that her mother had not resided there due to clutter-related safety concerns. Although there was no evidence of subletting, it was confirmed that the daughter lived at the property.
- CAFS submitted an investigation report to the housing officer, who was preparing to issue a Notice to Quit because the tenant had parted with possession of the property. However, the tenant passed away, leading the daughter to file a succession application. To assist the daughter, she was allocated sheltered housing in a one-bedroom property while the three-bedroom unit was repossessed and has now been let to a family in need of housing assistance.

Case Description

5.	<p>PROCEEDS OF CRIME ACT - The Corporate Anti-Fraud Service (CAFS) was asked to provide a Proceeds of Crime Act (POCA) service for a Westminster City Council planning case. A property in Harrow Road, London, W10 was converted into seven flats however, no planning permission was ever granted for the conversion of the property, and an enforcement notice was not complied with.</p> <p>A company incorporated in the British Virgin Islands were the freeholders, but investigations identified the Director operating in the UK. He was charged with failing to comply with an enforcement notice contrary to section 179(5) and section 331(1) of the Town and Country Planning Act 1903. He appeared at Southwark Crown Court for trial in 2023 and entered guilty pleas on behalf of himself and on behalf of the company.</p> <p>CAFS Financial Investigator conducted a comprehensive financial investigation on behalf of Westminster City Council, into the assets and criminal benefit of the defendant. In September 2024, at Southwark Crown Court, a Confiscation Order for the sum of £415,000 was imposed on the defendant.</p> <p>Once the Order is fulfilled LBHF hope to receive 18% of the proceeds for the investigation work undertaken by our Financial Investigator.</p>
6.	<p>TENANCY FRAUD (Abandonment): Housing raised concerns with CAFS regarding possible sub-letting at Lickey House, W14, after a report from Gas Safety Officers. The report indicated that three males were claiming to have keys and personal belongings in the property, asserting that the female tenant was "stuck in Ethiopia."</p> <p>Further investigations confirmed that the flat was occupied by these three males, with findings including male clothing, shoes, and Deliveroo bags. The tenant had departed the UK for Ethiopia in 2019 and had not returned since. Additional evidence from utility companies and bank statements confirmed that the tenant had not been living at the property.</p> <p>Repossession proceedings were initiated, leading to a County Court Trial, which the tenant did not attend or defend, resulting in the Council being granted outright possession.</p>
7.	<p>DISABLED BLUE BADGE (Misuse): A staff member was reported by a resident for improperly using a Disabled Blue Badge at Bagley's Depot. CAFS escalated the report to the Blue Badge Fraud Investigations (BBFI) who promptly located the vehicle displaying the Badge on Kilkie Street, where a tabard with H&F branding was visible in the back seat.</p> <p>The Blue Badge holder was identified, which opened a line of inquiry regarding the potential identity of the driver. The suspected driver's shift hours were obtained, and BBFI initiated an operation to intercept him as he returned to the vehicle.</p> <p>On the day of the operation, a BBFI officer approached a man at the vehicle who confirmed his identity as a LBHF employee. He acknowledged that the badge belonged to his mother and admitted to using it for parking his vehicle. He was cautioned, and the officer confiscated the badge. A report was submitted to Human Resources, and disciplinary procedures were enacted, resulting in the driver's dismissal.</p>

Case Description

- 8. TENANCY FRAUD (Abandonment):** CAFS received a notification from the gas safety team indicating that, during a forced entry into a residence at Hayter House on the White City Estate, officers suspected that the property was being sublet.
- Investigations conducted by CAFS uncovered a minimal financial presence for the tenant at the registered address, revealing only one bank account and a single utility bill in their name. The bank account showed very few transactions.
- Throughout the investigation, CAFS made several visits to the property, but there was no response from the tenant. Eventually, the investigator left a hand-delivered letter requesting contact, but the tenant did not reply. Travel checks indicated no record of the tenant traveling in or out of the UK for the last five years. However, open-source intelligence suggested that the tenant was living in the USA. It was therefore reasonably concluded that the tenant had departed the UK over five years ago, which could account for the absence of travel data during that time.
- Based on the evidence provided by CAFS, the housing team issued notices for possession of the property. The tenant appeared to have received these notices, as they completed a vacation notice form and returned the keys to the three-bedroom property.
- 9. PREVENTION (Assignment):** Housing raised concerns with CAFS regarding an assignment application submitted by the tenant of a three-bedroom property located on Peterborough Road, SW6. The tenant intended to transfer her tenancy to her son.
- A review of the tenancy records indicated that a prior investigation conducted in 2012 found the tenant residing in Kent, while her son and his family occupied the property on Peterborough Road. The latest investigations soon revealed that the tenant had no active finances associated with the tenancy address, but there were numerous accounts and credit inquiries linked to Kent. Further corroborative evidence from Swale Council, the Passport Office, and the Swale Island and Rural Children Social Work Team confirmed that the tenant had been living in their jurisdiction for several years.
- Based on the evidence collected, it was determined that the tenant had not been residing at the tenancy address and had likely been sub-letting the property. As a result, the assignment application was denied, and repossession proceedings were initiated.

Case Description

- 10. DIRECT PAYMENTS:** CAFS received a request for investigative assistance from a Social Worker who was concerned about the proper management of a client's affairs. A review of the client's payments and expenditures revealed significant inconsistencies.
- Initially, the investigation found that funds allocated for care were not being used for care, resulting in an overpayment exceeding £12,000. However, during a home visit by CAFS investigators, it became evident that the family was struggling to care for the autistic adult client, who often spent their personal care payments on non-essential items and occasionally went missing, prompting the family to file police reports.
- CAFS subsequently prepared a report recommending the cessation of direct payments, an updated care assessment, and the transition of the client to commissioned care, with the Council taking responsibility for the identified needs in the care package. This change was implemented in September 2024, and the client was also placed in respite care to provide additional support to the family.
- 11. TENANCY FRAUD (Subletting):** An investigation was initiated after the CAFS received an online Fraud Report. The report claimed that the tenants of a property located in Roseford Court, W12, were subletting their social tenancy while living in a property they owned in Enfield.
- The investigation uncovered ownership of a property in Waltham Abbey through land registry records, prompting an invitation for the tenant to participate in an interview regarding their tenancy. During this interview, the tenant denied any subletting activities, asserting that they were separated, with the wife residing at the tenanted property and the husband living in Waltham Abbey.
- Nevertheless, the evidence suggested that both individuals may have vacated the tenanted property, as visits to the address indicated that it was no longer occupied by the tenants.
- The tenants were requested to attend a follow-up interview but opted to relinquish their two-bedroom tenancy before any further actions could be taken.

Case Description

- 12. CRIMINAL PROSECUTION:** In 2019, maintenance workers at Lannoy Point, SW6, raised concerns about a tenant's residency. Investigations revealed all communications were routed through international phone numbers or the tenant's relatives.
- When Lannoy Point was set for demolition, a man claiming to live in the tenant's flat attended a resident engagement meeting. He presented a tenancy agreement, stating his landlord lived overseas. This led investigators to a letting agency in Fulham Broadway, where it was discovered the tenant's brother-in-law had rented out the address.
- The tenant, interviewed under caution, denied knowledge of sub-letting and blamed his brother-in-law. He couldn't specify his absences from the property and ended the interview when confronted with evidence of his three-year absence from the UK.
- Collaboration with Belgian police revealed the tenant's travel dates. Evidence showed he spent only 34 days in the UK between 2014 and 2019. Criminal proceedings were initiated, and the case was presented at Isleworth Crown Court in April 2024.
- During the trial, the tenant claimed innocence, stating he gave the keys to his sister and was unaware of sub-letting. However, evidence showed his sister deposited money into his bank account, enabling him to pay rent and council tax. Travel records indicated he stayed in hotels during his visits, contradicting his claim of being on a spiritual retreat.
- The jury found him guilty of fraud by false representation and failing to disclose information. Sentencing in July 2024 resulted in a two-year suspended prison sentence, 200 hours of community service, a curfew monitored by an electronic tag, and a requirement to pay LBHF £18,000.