


<p>London Borough of Hammersmith & Fulham</p> <p>Audit, Pensions and Standards Committee</p> <p>15 June 2016</p>	
<p>CORPORATE ANTI-FRAUD SERVICE END OF YEAR REPORT - 1 APRIL 2015 TO 31 MARCH 2016</p>	
<p>Open Report</p>	
<p>Classification: For Information</p>	
<p>Wards Affected: None</p>	
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1. EXECUTIVE SUMMARY

- 1.1 This report provides an account of fraud related activity undertaken by the Corporate Anti-Fraud Service (CAFS) 1 April 2015 to 31 March 2016.
- 1.2 CAFS are part of the Shared Service Anti-Fraud Service. Although CAFS remains a single entity within the London Borough of Hammersmith & Fulham, the partnership continues to reap a number of benefits including the sharing of skills and expertise, a “compare and contrast” review to identify the best practice, and the streamlining of anti-fraud related policies and procedures.
- 1.3 CAFS continues to provide H&F with a full, professional counter fraud and investigation service for fraud attempted or committed against the Council.
- 1.4 This report details the first year of work with a reduced establishment following the Government’s decision to centralise the investigation of housing benefit fraud, creating a Single Fraud Investigation Service (SFIS). On 1 March 2015 four investigators from CAFS transferred their employment to the Department for Work and Pensions (DWP).
- 1.5 Since April 2015 CAFS identified 109 positive outcomes, including eight prosecutions, 30 recovered tenancies and seven Proceeds of Crime (POCA) recoveries totalling £409,284.
- 1.6 Of the 336 cases referred to CAFS for potential investigation 201 were accepted and 135 were rejected due to lack of information or lower risk scoring.

1.7 For the financial year ending 31 March 2016, over £4.4million of fraudulent activity has been identified, as detailed in the following table.

Activity	Fraud proven 2014/15	Fraud proven 2015/16	Fraud identified 2015/16 (£'s)
Housing Fraud – applications	7	5	90,000
Housing Fraud - assignments & successions	2	3	106,000
Right to Buy	10	17	1,766,300
Prevention	19	25	1,962,300
Tenancy Fraud (Council and Registered Providers)	20	30	1,441,000
Housing and Council Tax Benefit (legacy cases 15/16)	44	8	354,251
Internal Staff and Other Services	26	14	259,683
Low risk fraud – Parking, Accessible Transport and Council Tax SPD	29	20	4,556
Detection	119	72	2,059,490
Proceeds of Crime Act – confiscation	9	12	409,284
Deterrence	9	12	409,284
TOTAL	147	109	4,431,074

1.8 Details of a sample fraud cases are reported at Appendix 1.

NB: fraud in the different areas has been notionally valued as follows;

- Tenancy Fraud: £45,000 per property based upon the average cost of temporary accommodation (£18,000 p.a.) multiplied by the average length of stay. An additional £8,000 saving is also claimed when keys are returned based upon average cost of legal action and bailiff intervention to recover property via the court.
- Right to Buys: £103,900, the value of the discount per application.
- Succession: As per Tenancy Fraud because each time a fraudulent assignment or succession is stopped a vacant possession is returned to the Council.
- Housing Fraud: £18,000 based upon the average cost of maintaining a family in temporary accommodation for one year.

2. RECOMMENDATIONS

2.1 Note the fraud work undertaken during the year 1 April 2015 to 31 March 2016.

3. REASONS FOR DECISIONS

- 3.1 To inform the Committee of the actions of the Council's counter fraud response.

4. WHISTLEBLOWING

- 4.1 The Council's whistleblowing policy, known as "Reporting your Concerns at Work" identifies the Shared Service Director for Audit as one of the main contacts for staff wishing to report a concern that they believe they cannot discuss with their line manager.
- 4.2 From 1 April 2015 to 1 March 2016 one whistleblowing referral (as defined in the policy) has been received, and investigations are on-going.
- 4.3 CAFS will review the existing process and run a Council wide campaign during 2016/17 to ensure all staff are fully aware of the policy and process for making referrals.

5. ANTI-FRAUD STRATEGY

- 5.1 CAFS are currently developing a new Anti-Fraud Strategy across the three partnership Councils. The strategy will align to the newly released national strategy, **Fighting Fraud and Corruption Locally**, as well as placing greater emphasis upon developing and improving fraud prevention techniques across H&F.
- 5.2 With reducing investigative resources an anti-fraud strategy can no longer depend on detection and enforcement activities alone, and the success of preventative techniques, as seen in the Right To Buy process, evidences the effectiveness of this activity.
- 5.3 Prevention is often the most efficient way to make savings and the strategy will aim to educate staff about the risks of fraud, as well as provide the appropriate skills, tools and support to prevent it.
- 5.4 The prevention element of the Council's new strategy will be underpinned by five key work streams;
1. **Evaluation** – CAFS will assess and gain a greater understanding of the various fraud risks the Council faces, performing a risk assessment and fraud resilience check.
 2. **Engagement** – Liaison across Council services and departments to further quantify fraud risks and mitigating processes.

3. **Education** – Bespoke fraud awareness to inform staff about the risks and impact of fraud occurring with their own services as well as across the Council.
 4. **Empowerment** – Provide services with the skills, techniques, tools and controls that will aid fraud prevention.
 5. **Enforcement** – Where fraud is identified that cannot be dealt with at a service level, CAFS will continue to provide investigative support and continue to investigate suspicions of fraud.
- 5.5 Work which underpins the planned strategy has already commenced and this report details the year's counter fraud activities under the headings; Detection, Prevention and Deterrence.
- 5.6 A copy of the newly released national strategy, Fighting Fraud and Corruption Locally is provided at Appendix 2 for reference.

6. FRAUD PREVENTION ACTIVITIES

Fraud Prevention Tools

- 6.1 CAFS provided Housing Officers within H&F Direct with an on-line tool for the assessment of all new housing applications. The National Fraud Initiative's (NFI) Application Checker allows frontline staff to check and verify the details of all new applications for housing.
- 6.2 The NFI is a sophisticated data matching exercise devised by the Audit Commission and currently overseen by the Cabinet Office, which matches electronic data within and between public and private sector bodies to prevent and detect fraud.
- 6.3 By using the Checker, Housing Officers can access the data held by the NFI and verify the information provided by the applicant. This reduces the risk of fraudulent applications and streamlines the process of checking them. It is easy and quick to use, instantly providing key information about the applicant.
- 6.4 A case study evidencing the benefits of the checker can be found at Appendix 1 (case 5)
- 6.5 Following the rollout of the checker to housing, access to the service was extended to Schools Admission to assist with their verification process for the September 2016 intake of new students.
- 6.6 In addition to the NFI Checker, CAFS also rolled out the West London Hub "Track a Fraudster" system which provides additional support for Housing Officers processing new applications.
- 6.7 The Hub extracts data from participating Councils. The data includes tenancy data, common housing register information and Council Tax Replacement

Scheme (CTRS). It then matches this data between authorities in order to identify anomalies. For example, if a H&F tenant is receiving CTRS from another Council, it suggests the possibility of tenancy or housing fraud and the matter can be further investigated before any application is approved.

Right to Buy (RTBs)

- 6.8 The number of RTB applications has continued to rise over the last 12 months with tenants benefiting from the scheme's discounts up to a maximum of £103,900.
- 6.9 With such large discounts available to prospective purchasers there is a greater risk of fraud, and to this effect CAFS work in partnership with HomeBuy and apply an enhanced fraud prevention process to all new RTB applications.
- 6.10 The additional checks, which include anti-money laundering questionnaires as well as financial and residential verification, provide assurance that tenants are eligible to the discount and fulfil the criteria of the scheme ahead of completion.
- 6.11 In the year to 31 March 2016 CAFS have successfully prevented 17 Right to Buys from completion, where suspicion was raised as to the tenant's eligibility or the provenance of their financial status. In many instances these have been as a result of the tenant voluntarily withdrawing their application once checking commenced.
- 6.12 The prevention work undertaken by CAFS in respect of RTBs continues to protect valuable Council stock.

7. FRAUD DETECTION ACTIVITIES

Corporate investigations

- 7.1 Corporate investigations are defined as fraud cases which relate to employee fraud or other third party fraud which does not fall within a specific CAFS service area such as Housing or Tenancy Fraud.
- 7.2 Since 1 April 2015 work in this area has included;
- The cancelling of a statutory home loss compensation due to an inaccurate application for funding.
 - A fraudulent application and misuse of the Personal Budget payment scheme intended for care provision.
 - Theft from a school's bank account culminating in a 2 year prison sentence for the offender.
 - Low level procurement fraud in relation to a school's maintenance programme.
 - Disciplinary hearing for a member of staff who had misappropriated client's funds and misused taxi expenses meant for the transportation of clients.

- False applications, and multiple applications for H&F parking permits.
- Advisory reports to guide and assist departments in relation to anti-fraud procedures (Including preventative measures).

7.3 Details of a sample fraud cases are reported at Appendix 1.

Housing/Tenancy Fraud

7.4 CAFS continues to provide an investigative support resource across all aspects of housing, from the initial applications for assistance to the investigation of tenancy breaches.

7.5 CAFS deal with any reactive allegation received and seeks to recover misused tenancies and prosecute where there is believed to be criminal activity. CAFS continue to receive referrals about a variety of housing elements including;

- Housing applications
- Under and over occupancy
- Assignment and succession
- Right to Buy
- Sub-letting
- Abandonment

7.6 A new dedicated investigation resource has been employed within H&F Housing Department, and CAFS will continue to explore the working arrangements between this post and the Council's dedicated anti-fraud resource in respect of Tenancy Fraud investigations.

7.7 In the year to 31 March 2016 CAFS have successfully recovered 30 social housing properties; stopped 17 Right to Buys, prevented two false succession applications, and stopped five false Housing applications. At the year-end 68 cases remained under investigation of which six are either subject to current court action or have been issued with a formal "Notice to Quit".

Registered Social Landlords (RSLs)

7.8 CAFS continue to work in partnership with all RSLs operating across the Borough, sharing a common aim to prevent, detect and deter Tenancy Fraud.

7.9 CAFS provide investigative support in order to recover properties on behalf of the RSLs with the understanding that when CAFS recover a fraudulently sub-let property, the nomination rights to that property (or one of a similar size) is offered to the Council.

7.10 The partnership working has greatly benefited H&F with the recovery of 18 properties, meaning an addition 18 properties that H&F can allocate to those in genuine need of assistance.

7.11 Details of significant investigations are reported at Appendix 1, for information.

8. FRAUD DETERRENCE

8.1 Preventing 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 important that a robust enforcement response is available to pursue fraudsters and deter others.

Prosecution

8.2 In the year to 31 March 2016 CAFS successfully prosecuted eight offenders including an individual who failed to declare that she already owned a property when she presented herself to the Council as homeless.

8.3 Details of significant prosecutions are reported at Appendix 1, for information.

Proceeds of crime act

8.4 The use of dedicated Financial Investigators continues to provide rewards with just over £484k confiscated from convicted offenders as a result of Proceeds of Crime intervention.

8.5 Financial investigators continue to actively pursuing opportunities to assist other departments across the Council, working closely with the Legal Services as suitable cases are identified.

9. OPTIONS AND ANALYSIS OF OPTIONS

Not applicable

10. CONSULTATION

Not applicable

11. EQUALITY IMPLICATIONS

Not applicable

12. LEGAL IMPLICATIONS

Not applicable.

13. FINANCIAL AND RESOURCES IMPLICATIONS

Not applicable.

14. RISK MANAGEMENT

Not applicable.

15. PROCUREMENT AND IT STRATEGY IMPLICATIONS

Not applicable.

LOCAL GOVERNMENT ACT 2000 **LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT**

None.

APPENDIX 1
Anti-fraud Activity 2015/2016 – Case Examples

	Case Description	Result/Outcome
1.	<p>EMPLOYEE – An allegation was received from a member of the public that a Council Officer was failing to fulfil his duties and that he may have been using a satellite office to receive personal mail.</p> <p>Initial enquiries by the officer’s manager found personal belongings at the site which appeared to corroborate the allegations.</p> <p>The matter was passed to CAFS who conducted a more in depth investigation which revealed fake documentation created by the employee, and sent to a University to support an unknown individual grant application.</p> <p>The employee had created the counterfeit reference on his work computer, completing the deception by forging the signature of a former Council employee. [The ex-employee later verified the signature was not theirs].</p> <p>Although no financial loss was incurred, the fake reference purport to be from a manager at H&F and he had therefore brought the Council into disrepute.</p>	<p>The evidence gathered was presented to Human Resources who began disciplinary proceedings. Ahead of a scheduled hearing the employee resigned.</p>

<p>2.</p>	<p>EMPLOYEE - CAFS received a referral via Human Resources. A temporary manager operating within Family and Children's Services had identified several financial irregularities and wanted the assistance of CAFS to investigate.</p> <p>Initial enquiries identified excessive use of taxis to attend meetings with clients. Furthermore, discrepancies had been identified in the petty cash transactions, with large amounts being claimed in comparison to what clients were receiving.</p> <p>Upon closer inspection investigators identified expenses being claimed for taxi journeys when the staff member was on leave, and at weekends. None of these could be attributed to work related trips.</p> <p>The petty cash transactions showed several claims for £300, although the clients gave statements to say they had received only £250.</p>	<p>The Council followed the disciplinary process although due to ill health it was not in the public's interest to pursue the offender via the criminal court.</p> <p>A full review of the financial controls remains on-going.</p>
<p>3.</p>	<p>PERSONAL BUDGET - CAFS received a referral from Adult Social Care regarding the misappropriation of funds intended to pay for care provisions.</p> <p>Investigations revealed that the client had changed her name and had been using both her current and former names to deceive Adult Social Care.</p> <p>When applying for a care package from the Council, they cited a paid carer, but this paid carer was merely herself (her former name) and the invoice details were those of her former bank account.</p>	<p>In total, payments between February 2013 and October 2014 were deemed fraudulent, and amounted to £17,120</p> <p>Due to ill health we were advised that any action against the subject would have a detrimental effect, and the case was deemed not to be in the public's interest.</p> <p>The debt is currently being repaid.</p>

<p>4.</p>	<p>Home Loss Payment Fraud – The Earl’s Court Regeneration Team referred a Home Loss application to CAFS when they doubted the residency of the leaseholder in Ivatt Place.</p> <p>Under the Land Compensation Act 1973 a property owner who is displaced from their home as a result of a compulsory purchase order, is eligible for compensation up to and including a maximum amount of £49,000. However, the regulations state that to be eligible the homeowner must also be the occupier.</p> <p>Visits to the property found evidence of residents, but none of them were the owner. The visits also showed that the property had been converted, without planning permission, so that all rooms (except the kitchen and bathroom) were converted into bedrooms in order to maximise the number of tenants the owner could rent to.</p>	<p>Further enquiries by CAFS including financial links and residents parking permits proved the leaseholder’s main and principle home was not Ivatt Place.</p> <p>The evidence was passed to the Regeneration Team and as a result of the investigation the compensation payment was refused.</p>
<p>5.</p>	<p>HOUSING FRAUD – In September 2015 Housing received a new application for housing, and in accordance with the preventative measures implemented by CAFS, the Housing Officer used the “NFI application checker” tool.</p> <p>The “application checker” revealed that the applicant was linked to an address in the London Borough of Ealing even though her application said she lived with her mother, and therefore connected her to the Borough.</p> <p>The case was passed to CAFS who confirmed that for the last 16 months she was living in Ealing, having also claimed benefits there up to June 2015.</p>	<p>The subject initially appealed against the decision to remove her from the Common Housing Register, but using the evidence presented by CAFS the decision was upheld.</p>

<p>6.</p>	<p>TENANCY FRAUD – CAFS received a referral which suggested that the tenant of Council property in Strode Road, Fulham was sub-letting the address.</p> <p>When investigators visited the house, the tenant showed them around but refused them entry to the garden and shed and stated he didn't know where the key was to a locked bedroom on the second floor. He said a male friend found in one of the rooms was visiting from east London, but could not provide the officers with his surname, nationality or where he lived.</p> <p>The investigators later cross-referenced the mobile telephone number of the tenant, which was provided when he'd applied for a parking permit, against advertising website Gumtree and found adverts for rooms to rent, which the officers recognised as those they had seen earlier.</p> <p>Working in partnership with the police and the DWP, the property was raided in the early hours of October 2014 and the full scale of the fraud was uncovered.</p> <p>The tenant had been renting rooms out for between £645-£700 per room per month, plus £80-£100 a month towards utilities and deposits of £300-£540 per room.</p> <p>To maximise his illegal income, by making as many rooms as possible available to let, the tenant was living in the garden shed. He had converted it into living quarters with an en-suite bathroom and built-in wardrobe so he could live in comfort while he profited from more than £95,000 in benefits, plus the income from his sub-letting.</p>	<p>Evidence amassed from financial records and correspondence seized at the address showed the deception had continued for 12 years, and resulted in an overpayment of benefits in excess of £95,000 (£44,705.55 housing benefit, £10,997.63 council tax benefit and £39,737.61 jobseekers allowance).</p> <p>On 21 August 2015 at Isleworth Crown Court the tenant was jailed for 10 months. The judge reduced the sentence from 15 months to 10 months on account of the tenant's early guilty plea, age and various medical conditions.</p> <p>The Council were awarded outright possession of the 4bedroom property. Eviction took place in March 2016 and the property is now being made ready to support a family in genuine need of assistance</p>
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<p>7.</p>	<p>TENANCY FRAUD & RTB – Where Homebuy receive new Right to Buy applications, the files are passed to CAFS in order to vet the applicant, this often includes checks regarding Anti-Money Laundering (AML).</p> <p>A RTB application for a property in Margavine Road, W6 suggested that the tenant was linked to an alternative address.</p> <p>Further enquiries were undertaken, and the tenant asked to complete an AML Form. The returned form confirmed the tenant owned property elsewhere although she said this was investment purposes only.</p> <p>However, evidence gathered, including financial records, showed she had not been resident at the H&F address for over 5 years, and that the property she owned was not for “investment purposes” but in fact her main and principle home.</p>	<p>Upon the return of the AML form her RTB application was quashed. Furthermore, the evidence enabled Housing Officers to serve a Notice to Quit.</p> <p>On 16 November 2015 the subject handed back the keys to the property.</p> <p><i>[Three bedroom property recovered and allocated to a family in genuine need of assistance. The Right to Buy, and a £105,000 discount, quashed.]</i></p>
<p>8.</p>	<p>RIGHT TO BUY (RTB) – CAFS received an anonymous allegation that a tenant in Frithville Gardens had submitted a fraudulent RTB application.</p> <p>The applicant had declared a link to an address in Hartlepool, but detailed that this was an old rental address prior to moving to London.</p> <p>However, investigations revealed that the applicant was never the tenant, but was in fact, and continued to be, the owner of the property.</p>	<p>Homebuy Team confirmed that this was a breach of the RTB criteria and the application was rejected.</p> <p>Having now discovered they were home owners at the point of being housed by LBHF, investigations remain on-going as to the legitimacy of the original housing application.</p>

<p>9.</p>	<p>TENANCY FRAUD – CAFS received an allegation from a Housing Officer that suggested the tenant of a property in Lakeside Road was no longer living there, but instead the tenant’s son was resident and sub-letting some of the rooms.</p> <p>Investigators made several visits to the property to verify residency but all were unsuccessful. However, deskbound enquiries revealed;</p> <ul style="list-style-type: none"> • The tenant was financially linked to a property in Brighton. • HM Land Registry verified the H&F tenant to be the owner of the Brighton property, and had been since 2008. • Bank statements showed cash machine withdrawals were all made from branches in and around the Brighton area. 	<p>In view of the evidence gathered the tenant was invited to attend an interview under caution.</p> <p>The tenant attended the meeting with her daughter who waited outside the interview room. Just as the investigator was about to start the CD recorder, the tenant asked if she could speak to her daughter.</p> <p>The tenant returned to the interview room where she said, “I don’t want trouble”, and asked to sign a “Notice to Vacate” form.</p> <p>Shortly after the keys to the address were returned to the housing officer.</p> <p><i>[Three bedroom property recovered and now occupied by a family in genuine need of assistance]</i></p>
<p>10.</p>	<p>HOUSING FRAUD – CAFS received an allegation from H&F Direct when a female presented herself as homeless. She had explained that her previous landlord in Askew Road had evicted her unfairly. They claimed she had not paid any rent, but she refuted this and presented a bank statement showing payments.</p> <p>The vigilant Officer in H&F Direct became suspicious of the bank statement and referred the matter to CAFS.</p> <p>CAFS’s financial investigators contacted their banking counterparts who confirmed the bank statements were forgeries. They supplied the originals and when compared to those presented by the applicant showed no rent payments had been made in the last six months.</p>	<p>The applicant was invited to attend three interviews under caution but on each occasion she failed to appear.</p> <p>She stopped engaging with CAFS, and in January 2016 H&F Direct discharged their duty to house.</p>

<p>11. TENANCY FRAUD – CAFS received an allegation from Housing that suggested the tenant of a property in Mackenzie Close was not resident.</p> <p>Initial intelligence checks linked the tenant to an address in Ealing, but also linked him to several alias. A check with the Home Office confirmed that he had changed his name several times.</p> <p>The amount of names attributed to the tenant made the investigation extremely complex, however the investigator was able to amass sufficient evidence to show that the tenant;</p> <ul style="list-style-type: none">• Lived in Ealing• Owned a property in Ealing• Had an outstanding mortgage• Ran a business importing wildlife to UK zoos <p>There was no evidence to suggest the MacKenzie Close address was being sub-let but the evidence did suggest it was not his main and principle home. The evidence also suggested he may have been using the property as a business address.</p> <p>Following discussions with the local police a decision was taken to obtain a warrant and the property was searched. Documentary evidence found confirmed the above information, as well several items which were seized by the police – these matter have been dealt with separately.</p>	<p>The evidence was presented to HRD and the Council’s solicitors who immediately began repossession action.</p> <p>Throughout the tenant failed to attend interviews or initial court hearings. But on the day of the eviction he made a last minute attempt to adjourn the matter, but this was thrown out by the judge.</p> <p>The property was recovered with the assistance of bailiffs in December 2015.</p> <p><i>[Three bedroom property recovered and now occupied by a family in genuine need of assistance]</i></p>
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<p>12.</p>	<p>TENANCY FRAUD (Shepherds Bush Housing Group) – CAFS received an allegation from a Shepherds Bush Housing Group (SBHG) Housing Officer who had conducted a residency check and found unknown residents.</p> <p>The property in Cairns House, Wandsworth Bridge Road, had various different names on the electoral register, and a similar response was received when the investigator conducted financial checks.</p> <p>Using powers under the Prevention of Social Housing Fraud Act the investigator obtained bank statements which showed a high volume of credits from different individuals. These payments were referenced with annotations that included, “rent”, “deposit” and “Cairns House rent”.</p> <p>During interview the tenant denied all allegations of subletting, stating the payments were merely from friends who were part of a “partner group”. These are collective schemes which allow friends to save together.</p>	<p>The evidence was shared with SBHG solicitors who were satisfied that CAFS had gathered sufficient evidence to proceed to court for possession.</p> <p>During the subsequent hearing the tenant attended unrepresented asking for an adjournment which the judge refused.</p> <p>Having been refused the adjournment the tenant walked out of court saying she no longer wanted to participate and will be appealing the decision. The judge tried to explain that no decision had been made but the tenant left.</p> <p>The hearing commenced and the judge awarded outright possession forthwith and awarded costs.</p> <p><i>[Two bedroom property recovered and now occupied by a family in genuine need of assistance]</i></p>
<p>13.</p>	<p>TENANCY FRAUD (NHHG) – CAFS received an allegation from a NHHG Housing Officer that suggested the tenant of a property in Girdlers Road was not the tenant but had assumed the identity of their real tenant.</p> <p>The only information their records held was a photocopy of an Oystercard.</p> <p>CAFS began their enquiries and discovered that financial records only listed a “third party” as having bank accounts at the property. There was no information regarding the</p>	<p>The evidence was shared with NHHG who immediately issues a Notice to Quit and commenced legal proceedings.</p> <p>But before the first hearing NHHG received the keys in an envelope, and upon inspection they found a vacant property.</p> <p><i>[One bedroom property recovered and now occupied by a family in genuine need of assistance]</i></p>

	<p>actual tenant.</p> <p>The investigator made enquiries with UK Passport Office and obtained a copy of the passport belonging to the "third party". It clearly showed that a match between the images on the Oystercard and passport, and thereby evidencing the fact that the real tenant's identity had been hi-jacked by this "third party".</p>	
<p>14.</p>	<p>TENANCY FRAUD (Peabody Trust) – CAFS received an allegation from a Peabody Housing Officer who had not seen the tenant of a Peabody Building (Lillie Road) address.</p> <p>There had been a young male residing, but the tenant, a middle aged woman, had not been seen.</p> <p>CAFS investigation showed that the tenant had not been linked to the property for some time. The only financial links were a male, who transpired to be the nephew of the tenant.</p> <p>The tenant's financial trail ceased in 2014 when she stopped paying rent and Council Tax via direct debit. At this time payments changed to cash which suggested she vacated at this time and left the property to the nephew, thereby circumvented the process of allocation.</p>	<p>The evidence was shared with Peabody who immediately issues a Notice to Quit and commenced legal proceedings.</p> <p>But before the first hearing Peabody the nephew attended Peabody Offices where he returned the keys.</p> <p><i>[Two bedroom property recovered and now occupied by a family in genuine need of assistance]</i></p>
<p>15.</p>	<p>TENANCY (Peabody Trust) – A case was referred by a housing officer from Peabody Trust, concerned that their tenant was no longer living in the UK and subletting the address in Fulham Palace Road.</p>	<p>The evidence was presented to the housing officer who immediately issued a Notice to Quit.</p> <p>On 12th April 2015 the property was surrendered.</p>

	<p>Initial deskbound checks failed to locate an alternative address for the tenant, but a review of the electoral register showed she was no longer registered, and had from time to time been added and then removed.</p> <p>Visits to the property were unsuccessful, but a late night visit by investigators found a couple resident. They explained that they were from the Philippines and had come to the UK to work in Charing Cross Hospital. They found the property advertised on one of the nurse's notice boards.</p> <p>Officers also discovered that the second bedroom was also being sublet to a hospital worker.</p> <p>It transpired that the tenant had immigrated to the Philippines, but left the keys to the property with a friend who effectively acted as managing agent; advertising the property, showing prospective tenants around and organising rental payments direct to the tenant's bank account.</p>	<p><i>[two bedroom property recovered and nomination rights passed to H&F]</i></p>
<p>16.</p>	<p>TENANCY (L&Q) – A case was referred by a housing officer from L&Q, were concerned that their tenant was no longer living at the address in Albion Mews, W6, but subletting the property.</p> <p>The Housing Officer was alerted to the fact that subtenants had made an application for housing benefit, and wanted CAFS to investigate further.</p> <p>The investigation revealed that the tenant had absconded,</p>	<p>The evidence was presented to the housing officer who immediately issued a Notice to Quit.</p> <p>On 24 November 2015 the property was surrendered and L&Q obtained vacant possession.</p> <p><i>[two bedroom property recovered and nomination rights passed to H&F]</i></p>

passing the keys to a friend who then let the property, effectively acting as a caretaker.

Evidence was obtained from the subtenants but CAFS were unable to track down the original tenant.