

## Appendix 2: Proactive Work Programme as at March 2016

Risk area	Tasks	Planned for	Current status
Housing Tenancy	Commence 'Operation Domus', the county-wide joint proactive drive to share data and intelligence on tenancy fraud.	April 2016	The work required to set this project up has now been completed and preparations are being made to launch it.
Right to Buy	Evaluate whether application processes can be strengthened to minimise the risk of fraud.	July 2015	Some work has been undertaken with South Essex Homes and the Allocations team on an individual application basis.  Consideration is being given to undertaking a formal review with Internal Audit in 2016/17.
Business Rates	Conduct a data matching exercise to identify possible misuse of exemptions claimed for commercial property, including 'Phoenix Companies' <sup>1</sup> .	June 2016	There is no national standard model for data matching in this area, therefore the current focus of this work is to develop the data matching tool.  At present, different data sets are being tested in conjunction with HM Revenue and Customs (HMRC) to ensure the results are reliable.
	Identify, from the data matching exercise, a tool that can be installed for use in the continual prevention of false exemption claims.	September 2016	
	Evaluate whether Business Rates processes can be strengthened to minimise the risk of fraud.	July 2016	
Council Tax	Evaluate whether Council Tax Discount and Exemption processes can be strengthened to minimise the risk of fraud.	August 2016	A joint working arrangement has been established with HMRC in relation to this.  This joint working has already identified fraud with student exemptions.
Social Care	Conduct a proactive exercise of Direct Payments and Financial Assessments to identify flags for potential fraudulent activity	June 2016	An exercise is being planned which involves test checking a random sample of 50 cases.

<sup>1</sup> 'Phoenixing, or phoenixism, are terms used to describe the practice of carrying on the same business or trade successively through a series of companies where each becomes insolvent (can't pay their debts) in turn. Each time this happens, the insolvent company's business, but not its debts, is transferred to a new, similar 'phoenix' company. (The Insolvency Service, 2016)

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	Introduce a trial protocol with the service to enable information and intelligence to be shared, with a view to identifying potential fraudulent claims for support in cases where the claimant should have No Recourse to Public Funds.	April 2016	Agreement achieved with Home Office Bureau to create a better information sharing service for the Council.  A draft joint working protocol is with the Safeguarding Manager and DMT awaiting sign off.
	Produce newsletters, highlighting current fraud risks and trends with best practice advice and guidance and investigation outcomes.	January 2016	Draft newsletters have been produced and are with the Media and Communications team for comment before being signed off.
Fraud Awareness	Introduce a formal, detailed intelligence alert system across all Council departments to inform services of immediate fraud risks.	January 2016	Draft intelligence alert templates have been produced are with the Media and Communications team for comment before being signed off.
National Fraud Initiative, Data Matching Exercise	Investigate high level recommended data matches until the 2015 exercise is complete.	Will report progress made on quarterly basis	As detailed in Appendix 3.