

Appendix 3 – Counter Fraud Work Plan 2021/22

KEY:

Denotes proactive initiatives
Denotes prevention/protection initiatives
Denotes development activities

Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
Counter fraud	Maintain business as usual through management of the caseload, timely investigation of referrals towards a prompt, efficient and fair resolution, proactive fraud detection initiatives and the provision of advice and training to the wider council.	Ongoing	Business as usual is being maintained, the team is at its full complement, albeit with one officer on maternity leave and the backlog of cases is in remission.	5	Shaun DUTTON	Ongoing
Business Rates	Pro-active audit of empty commercial premises.	TBD	This is dependent upon the pressures on the Business Rates team easing. Therefore aspirational at this time.	5	Shaun DUTTON	ON HOLD
Council Tax	Joint working agreement with DWP for cases involving the Council Tax Reduction scheme.	TBD	Information provided by the DWP suggests that their fraud investigation capability is not engaging at a local level. This makes a local joint working agreement impossible and	2	Shaun DUTTON Caroline MERCIECA	ON HOLD

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
			therefore this activity is on hold pending resumption of local DWP investigations. This situation will be monitored.			
Council wide	Internal publicity campaign to highlight the work and reporting mechanisms of the fraud team.	Ongoing	Avenues to increase the team's profile across the Council are being explored. The monthly fraud newsletter's audience is expanding and now reaches approximately 700 recipients.	1	Shaun DUTTON	Ongoing
		October 2021	Programme of publicity and talks to raise staff awareness of the Whistleblowing procedures and how to report concerns.	2	Shaun Dutton	15/10/2021
		October 2021	Publicity campaign to highlight International Fraud Awareness Week.	1	Shaun DUTTON	15/10/2021
Housing	Pro-active audit of SBC tenancies.	June 2021	The first exercise has been completed with some success.	4	Shaun DUTTON James COUSEN	26/06/2021
		October 2021	Currently awaiting a list of tenancies from South Essex Homes			
		March 2022				

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Housing	Review of SBC tenancy terms and conditions to strengthen the counter fraud message and encourage cooperation with the counter fraud team.	TBD	The South Essex Homes' tenancy T&Cs are due to be reviewed. South Essex Homes are aware that we wish to contribute. We are waiting for information as to when this review will take place.	1	Shaun DUTTON	Ongoing
Council wide	<p>Fraud risk and process analysis of areas of the Council's business at high risk of fraud:</p> <ul style="list-style-type: none"> • Procurement • Housing • Housing applications • School admissions • Blue badge applications • Council Tax • Business Rates • Online services • Social Care Direct payments • Recruitment • Others dependent upon current research <p>Policy review, process improvement recommendations where appropriate, service-specific training to be delivered where required.</p>	Start July 2021	<p>Planning. The methodology for conducting these risk assessments has been drafted and is under management review. Discussions are ongoing with Internal Audit to identify opportunities for some of these to be done in tandem with Audit work.</p> <p>CFIT continue to issue post-investigation reports recommending process/policy improvements that would provide a greater protection from fraud where appropriate.</p>	2-5	Shaun DUTTON	Ongoing
Blue Badge	<p>Review of the process on how Blue Badge fraud is dealt with and training for APCOA staff.</p> <p>Pro-active Blue Badge fraud exercise, possibly a joint exercise with APCOA and Essex Police.</p>	<p>August 2021</p> <p>TBA</p>	<p>The joint exercise with APCOA has been completed with no frauds detected. However, this was a high-profile exercise that received strong support from the community.</p> <p>The methodology of the exercise will be revised and a</p>	5	Shaun DUTTON Paul BROADBENT	20/08/2021

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			further exercise will be conducted later in the year.			
Housing	Postal information campaign to targeted tenancy areas to encourage reporting of concerns about fraud.	August/September 2021	Information has been request from South Essex Homes to start planning this exercise. A draft letter to tenants is currently under review.	2	Shaun DUTTON James COUSEN	Ongoing
Benefits	Contribute to the amendment of the Council Tax Reduction Scheme (CTRS) policy to ensure that the team is empowered to investigate CTRS fraud without a dependence on the DWP.	Summer 2021	Awaiting confirmation of when the policy is due for review.	1	Shaun DUTTON	Ongoing
Business Rates	Research project to determine best practice and effective methods of combatting Business Rates fraud. Establish a working group between CFIT, Trading Standards, Business Rates and Legal Services to review the Council's capabilities and determine realistic opportunities for prevention, detection and action against offenders.	November 2021	This project is waiting to be assigned. A meeting has been discussed with some of the interested parties regarding the BR issue but was interrupted by the Covid-19 crisis. This may have to wait until the pressure on the BR team is eased.	2	TBD Shaun DUTTON	Ongoing
Counter fraud	Explore joint working opportunities with other SBC teams, particularly parking, Regulatory Services and Trading Standards. Explore the possibility of information/intelligence sharing hub.	Ongoing	The team is now a participant in the Strategic Tasking Allocation Group which affords these opportunities and meets this task.	1	Paul BROADBENT	02/06/2021
Counter fraud	Develop a financial investigator capability. Develop a financial intelligence officer capability.	2022	This aspiration has been delayed by circumstance and now cannot be started until November 2021 at the earliest. This role works alongside and supports the financial	2 1	Shaun DUTTON Caroline MERCIECA David GILL	Postponed

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			investigator as well as conducting intelligence investigations.			
Specific teams	<p>Training in specific counter fraud techniques to be delivered to identified teams:</p> <ul style="list-style-type: none"> • False document identification • Spotting the signs of subletting <p>Others as identified through risk analysis activities (see below)</p>	March 2022	<p>An update on spotting the signs of subletting has been delivered to South Essex Homes' officers.</p> <p>A session on false document identification is being written.</p>	2	<p>Shaun DUTTON</p> <p>David GILL</p>	23/06/2021
Various	Investigate the use of technology and data matching to identify and target the risks of fraud against the Council. Develop targeted proactive exercises to act on the results.	March 2022	<p>This is aspirational and dependent upon a variety of factors such as information sharing agreements, the availability, cost and complexity of tools required to do this, staff training etc. Enquiries into the feasibility of this will be conducted as and when workload commitments allow.</p> <p>A meeting has been planned with a potential supplier of internet data mining services.</p> <p>A data matching exercise is being planned to assess the scale of fraud against the Essential Living Fund.</p>	2-4	<p>Shaun DUTTON</p> <p>David GILL</p>	Ongoing
Residents	Conduct a programme of presentations to local community groups and residents' associations to highlight the risks of fraud and how to protect self and the council.	Ongoing	These will be on a no more than monthly basis and the first talk has been delivered. Contacts are being collected from interested groups.	1	Shaun DUTTON	Ongoing

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Counter fraud	Develop 'income generation' opportunities through: <ul style="list-style-type: none">• Counter fraud training initiatives for SBC partners and service providers• An investigation and prosecution service to local Housing Associations• Provision of a Financial Investigation service to other SBC teams	TBD	This is aspirational at this time and development will be dependent upon how the team progresses over the coming 12 months. This cannot be explored at the expense of our ongoing workload commitments or proactive and prevention activities.	TBD	Shaun DUTTON	Ongoing
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