

Southend-on-Sea Borough Council

Finance & Resources Service

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Counter Fraud & Investigation Team

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Appendix 1 – Counter Fraud Work Plan 2020/21

KEY:

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| 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, two new investigators have joined the team, a programme of work (below) has been drafted. This has been hampered through staff sickness and maternity leave. UPDATE: the team is now at its full complement, albeit it with an investigator on maternity leave. | 4 | Shaun DUTTON | Ongoing ACHIEVED |
| 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. | 2-4 | Shaun DUTTON | NOT ACHIEVED |



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| Area | Activity | Target date | Current status | Resource requirement (officers) | Responsible officer | Completed date |
|--------------|---|-------------|---|---------------------------------|-----------------------------------|---|
| Council Tax | Joint working agreement with DWP for cases involving the Council Tax Reduction scheme. | TBD | A meeting with the DWP was held in January 2020. Discussions are ongoing but are dependent upon a response from the DWP. UPDATE: 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 therefore this activity is on hold pending resumption of local DWP investigations. This situation will be monitored. | 2 | Shaun DUTTON Caroline MERCIECA | ON HOLD NOT ACHIEVED |
| Council wide | Internal publicity campaign to highlight the work and reporting mechanisms of the fraud team. | Ongoing | This was in progress during the previous Work Plan but interrupted by the Covid-19 pandemic. Some of this is dependent upon the reoccupation of Council buildings. This is partially fulfilled through the distribution of monthly fraud updates to staff and may also be partially fulfilled through the instigation of fraud awareness training. These activities should be ongoing throughout the year. A message was sent to all Council staff in November 2020 highlighting the risks of | 1 | Shaun DUTTON | Ongoing PARTIALLY ACHIEVED |

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| Area | Activity | Target date | Current status | Resource requirement (officers) | Responsible officer | Completed date |
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| | | | fraud and the need for vigilance and awareness. | | | |
| Council wide | Fraud awareness training to be developed and mandated for all staff. | September 2020 | The course content has been finalised and delivery by e-learning has been agreed. The presentation of the course is in its final stages and we expect the course to be made available to all staff in the near future. It is anticipated that Senior Management support will be provided to make this course mandatory for all staff. This course has been finalised and is available to all SBC staff. | 1 | Shaun DUTTON | November 2020 ACHIEVED |
| Council wide | Fraud awareness training to be delivered to all new staff as part of the induction process. | September 2020 | If the above is successful, the online training will be mandatory for all new starters. Therefore, a shorter presentation will be developed to introduce new staff to fraud awareness during induction training. | 1 | Shaun DUTTON | November 2020 ACHIEVED |
| Housing | Pro-active audit of SBC tenancies. | September 2020 | This date is aspirational depending on how quickly the team recovers the backlog of work created by the Covid-19 crisis. Discussions will be held with South Essex Homes to determine how to best identify tenancies most at risk of fraud. | 4 | Shaun DUTTON James COUSEN | NOT ACHIEVED |

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| Area | Activity | Target date | Current status | Resource requirement (officers) | Responsible officer | Completed date |
|---------|---|-------------|---|---------------------------------|------------------------------|---------------------|
| | | | This has been delayed due to a backlog of investigations and a lack of human resources. | | | |
| Housing | Postal information campaign to targeted tenancy areas to encourage reporting of concerns about fraud. | TBD | As above, discussions will be held with South Essex Homes to determine how to best identify areas most at risk of fraud. The target date will be reviewed dependent upon other operational workloads. This has been delayed due to a backlog of investigations and a lack of human resources. | 2 | Shaun DUTTON James COUSEN | NOT ACHIEVED |
| 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. This has been delayed by South Essex Homes due to pandemic restrictions. | 1 | Shaun DUTTON | NOT ACHIEVED |

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| <p>Council wide</p> | <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> | <p>Start November 2020</p> | <p>Planning. This is dependent upon how the team and its workload develops. This has been delayed due to a backlog of investigations and a lack of human resources. CFIT continue to issue post-investigation reports recommending process/policy improvements that would provide a greater protection from fraud where appropriate.</p> | <p>2-4</p> | <p>Shaun DUTTON</p> | <p>NOT ACHIEVED</p> |
| <p>Blue Badge</p> | <p>Review of the process on how Blue Badge fraud is dealt with and training for ACPOA staff. Pro-active Blue Badge fraud exercise, possibly a joint exercise with ACPOA and Essex Police.</p> | <p>February 2021</p> | <p>Planning. Enquiries are being made to identify a means of tracing the keepers of offending vehicles if they do not provide their details (Essex Police and Traffic Management). This has been delayed due to a backlog of investigations and a lack of human resources.</p> | <p>4</p> | <p>Shaun DUTTON</p> | <p>NOT ACHIEVED</p> |

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| Business Rates | <p>Research project to determine best practice and effective methods of combatting Business Rates fraud.</p> <p>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.</p> | March 2021 | <p>The research project has been assigned and initial enquiries among other local authorities have started. This has been delayed due to a backlog of investigations and a lack of human resources.</p> <p>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.</p> | 2 | Shaun DUTTON Caroline MERCIECA | NOT ACHIEVED |
| Counter fraud | <p>Explore joint working opportunities with other SBC teams, particularly parking, Regulatory Services and Trading Standards.</p> <p>Explore the possibility of information/intelligence sharing hub.</p> | Ongoing | Some initial conversations, albeit superficial, have taken place. This may be dependent upon how the Covid-19 pandemic pans out and the pressure some of these teams are working under. | 2 | Shaun DUTTON | NOT ACHIEVED |
| Counter fraud | Develop a financial investigator capability. | Late 2021 | This aspiration has been delayed by circumstance and now cannot be started until late 2021. | 2 | Shaun DUTTON Caroline MERCIECA | DELAYED |

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| 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. | TBD | 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. | 2-4 | Shaun DUTTON | NOT ACHIEVED |
| 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 | 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 | NOT ACHIEVED |