

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 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 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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			therefore this activity is on hold pending resumption of local DWP investigations. This situation will be monitored. The lack of DWP engagement with local authorities is a subject of national concern at the moment and is being addressed through the Fighting Fraud and Corruption Locally group.					
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 continue to be 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 was completed, with some success.	5	Shaun DUTTON	26/06/2021		

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		October 2021 revised to March 2022	Currently awaiting a list of tenancies from South Essex Homes. This was provided in December and the Target date for this exercise has been revised to January 2022.		James COUSEN	Ongoing
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 their 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>This work will now be performed alongside Internal Audit's programme of work with risk assessment findings incorporated into their reports. This has the effect of adding more weight to any recommendations made and contributing to a closer working relationship between the two teams.</p> <p>CFIT continue to issue specific post-investigation reports recommending process / policy improvements that would provide a greater protection against fraud where appropriate.</p>	2-5	Shaun DUTTON	Ongoing

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Blue Badge	Review of the process on how Blue Badge fraud is dealt with and training for APCOA staff. Pro-active Blue Badge fraud exercise, possibly a joint exercise with APCOA and Essex Police.	August 2021	The joint exercise with APCOA has been completed. This was a high-profile exercise that received strong support from the community.	5	Shaun DUTTON Paul BROADBENT	20/08/2021
		December 2021				06/12/2021
		March 2022	The methodology of the exercise will be revised and a further exercise will be conducted later in the year. Counter Fraud officers have now been granted powers to inspect and retain Blue Badges. Warrant cards are currently being produced and a second proactive exercise will be conducted once these are available. Permission has been granted to deliver Blue Badge refresher training to APCOA CEOs and this is in production.			
Housing	Postal information campaign to targeted tenancy areas to encourage reporting of concerns about fraud.	August/ September 2021	This has been delivered through SEH's magazine to all tenants in the form of an open letter.	2	Shaun DUTTON James COUSEN	October 2021
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 Council's policy is due for review.	1	Shaun DUTTON	Ongoing

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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>	November 2021	<p>This project is waiting to be assigned.</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 reduced.</p>	2	TBD Shaun DUTTON	Ongoing
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	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	<p>Develop a financial investigator capability.</p> <p>Develop a financial intelligence officer capability.</p>	2022	<p>Funding has now been agreed to train two officers in Financial Investigation. The first course will commence in March 2022.</p> <p>This has been superseded by the ambition to have two officers trained as financial investigators.</p>	3 2	Shaun DUTTON Caroline MERCIECA David GILL	In progress
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	Shaun DUTTON David GILL	23/06/2021

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			across live and current data sets from across the public and private sectors.			
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
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 and possibly other local authorities. 	TBD	This is aspirational at this time and development will be dependent upon how the team progresses and develops over the coming 12 months. This cannot be explored at the expense of our ongoing workload commitments or proactive and prevention activities for the Council.	TBD	Shaun DUTTON	Ongoing