

**Southend-on-Sea City 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, albeit with one officer on maternity leave and the backlog of cases is in remission.	5	Shaun DUTTON	<b>ONGOING</b>
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	<b>07/04/2022</b>
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	<b>ON HOLD</b>



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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 are being explored. The monthly fraud newsletter's audience is expanding and now reaches approximately 700 recipients.	1	Shaun DUTTON	<b>ONGOING</b>
		October 2021	Programme of publicity and talks to raise staff awareness of the Whistleblowing procedures and how to report concerns.	2	Shaun Dutton	<b>15/10/2021</b>
		October 2021	Publicity campaign to highlight International Fraud Awareness Week.	1	Shaun DUTTON	<b>15/10/2021</b>
Housing	Pro-active audit of SBC tenancies.	June 2021	The first exercise has been completed with some success.	5	Shaun DUTTON James COUSEN	<b>26/06/2021</b>

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		October 2021  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.			<b>NOT ACHIEVED</b>  <b>28/01/2022</b>
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	<b>NOT ACHIEVED</b>
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"> <li>• Procurement</li> <li>• Housing</li> <li>• Housing applications</li> <li>• School admissions</li> <li>• Blue badge applications</li> <li>• Council Tax</li> <li>• Business Rates</li> <li>• Online services</li> <li>• Social Care Direct payments</li> <li>• Recruitment</li> <li>• Others dependent upon current research</li> </ul> <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 effects 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 from fraud where appropriate.</p>	2-5	Shaun DUTTON	<b>ONGOING</b>

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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 with no frauds detected.	5	Shaun DUTTON Paul BROADBENT	20/08/2021
		December 2021	However, this was a high-profile exercise that received strong support from the community.			06/12/2021
		March 2022	The methodology of the exercise will be revised and a further exercise will be conducted later in the year.			<b>NOT ACHIEVED DUE TO THE EMPTY NNDR PREMISES AUDIT</b>
		2022	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	Summer 2021	Awaiting confirmation of when the policy is due for review.	1	Shaun DUTTON	07/02/2022

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	empowered to investigate CTRS fraud without a dependence on the DWP.		This policy was reviewed in the Summer of 2021 without CFIT's involvement. We are currently trialling an approach with SCC Benefits that will avoid policy amendment.			
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 was held between interested parties and CFIT is now developing a protocol designed to disrupt pop-up shops in the High Street from evading NNDR and to limit their operational window.</p>	2	<p>TBD</p> <p>Shaun DUTTON</p>	<p><b>NOT ACHIEVED</b></p> <p><b>02/03/2022</b></p>
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	<p>The team is now a participant in the Strategic Tasking Allocation Group which affords these opportunities and meets this task.</p> <p>CFIT now has information sharing agreements with 17 teams across the Council and a closer working arrangement with Trading Standards.</p>	1	Paul BROADBENT	<b>02/06/2021</b>
Counter fraud	Develop a financial investigator capability.	2022	Funding has now been agreed to train two officers in Financial Investigation.	3	<p>Shaun DUTTON</p> <p>Caroline MERCIECA</p> <p>David GILL</p>	<b>24/03/2022</b>

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	Develop a financial intelligence officer capability.		One officer has now completed the Financial Investigator Course.  This has been superseded by the ambition to have two officers trained as financial investigators.	2		
Specific teams	Training in specific counter fraud techniques to be delivered to identified teams: <ul style="list-style-type: none"> <li>• False document identification</li> <li>• Spotting the signs of subletting</li> </ul> Others as identified through risk analysis activities (see below)	March 2022	An update on spotting the signs of subletting has been delivered to South Essex Homes' officers.	2	Shaun DUTTON	<b>23/06/2021</b>
		2022	A session on false document identification is being written.		David GILL	
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	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.  A meeting has been planned with a potential supplier of internet data mining services.  A data matching exercise is being planned to assess the	2-4	Shaun DUTTON David GILL	<b>ONGOING</b>  <b>POSTPONED</b>  <b>August 2021</b>

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
			<p>scale of fraud against the Essential Living Fund.</p> <p>A business case for membership of CIFAS has been prepared. This will allow the Council access to the National Fraud Database and the Enhanced Internal Fraud Database. These enable increased fraud intelligence gathering and risk assessment, enhanced employee and supplier vetting checks, enhanced evidence collection and data matching across live and current data sets from across the public and private sectors.</p> <p>A funding bid has been submitted for CIFAS membership.</p>			<b>ONGOING</b>
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	<b>ONGOING</b>
Counter fraud	Develop 'income generation' opportunities through: <ul style="list-style-type: none"> <li>• Counter fraud training initiatives for SBC partners and service providers</li> <li>• An investigation and prosecution service to local Housing Associations</li> </ul>	TBD	This is aspirational at this time and development will be dependent upon how the team progresses over the coming 12 months.	TBD	Shaun DUTTON	

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	<ul style="list-style-type: none"><li>• Provision of a Financial Investigation service to other SBC teams and possibly other local authorities.</li></ul>		This cannot be explored at the expense of our ongoing workload commitments or proactive and prevention activities.			