

**Southend-on-Sea City Council**

Finance & Resources Service

Executive Director Finance & Resources : Joe Chesterton

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**Counter Fraud & Investigation Team**

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**Appendix 1 – Counter Fraud Work Plan 2022/23**

**KEY:**

Denotes proactive activities
Denotes prevention/protection activities
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 a backlog of cases which is at a manageable level.	5	Shaun DUTTON	<b>ONGOING</b>
Council Tax	Joint working agreement with DWP for cases involving the Council Tax Reduction scheme.	March 2023	A meeting was held on 24/11/2022 to discuss joint working and the DWP have provided a process and draft agreements for consideration. These documents are currently being considered by Data Protection and Legal Services.	2	Shaun DUTTON Caroline MERCIECA	<b>ONGOING</b>



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Council wide	Promote Declaration of Interest registration across the Council.	November 2022	This was achieved through a 'Views on Sea' blog to all staff on 17/11/2022.	1	David GILL	<b>17/11/2022</b>
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>
		November 2022	Programme of publicity and talks to raise staff awareness of the importance of Declarations of Interest and how to make these.	1	Shaun DUTTON	<b>18/11/2022</b>
		November 2022	Publicity campaign to highlight International Fraud Awareness Week.	1	Shaun DUTTON	<b>18/11/2022</b>
		October 2022	Develop an Anti Money Laundering Awareness Course for all staff. A draft script has been provided to Learning & Development. This completes this activity and a new activity will be started to support L&D.	1	Caroline MERCIECA	<b>13/12/2022</b>
		March 2023	Target for publication of Anti-Money Laundering Awareness course to all staff.	1	Shaun DUTTON	<b>ONGOING</b>

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		May 2022	Engage with new starters in the Council at the point of induction to publicise CFIT, raise awareness of fraud and how to report it, and highlight the standards of behaviour and responsibility expected. This is expected to evolve into an induction eLearning course.	1	Shaun DUTTON	<b>30/09/2022</b>
Housing	Pro-active fraud detection and deterrence exercises on social tenancies.	May 2022	To be targeted in areas at high risk of subletting. Appropriate areas of activity will be determined during the planning stage.	5	Paul BROADBENT	<b>21/05/2022</b>
		August 2022			James COUSEN	<b>27/08/2022</b>
		October 2022	Due to the current workload on the team, this activity has been postponed to <b>March 2023</b> .		Caroline MERCIECA	<b>DELAYED</b>
Housing	Review of SBC tenancy terms and conditions to strengthen the counter fraud message and encourage cooperation with the counter fraud team.	May 2022	The South Essex Homes' tenancy T&Cs are under review and we have an active contribution.	1	David GILL	<b>10/05/2022</b>
Council wide	Fraud risk and process analysis of areas of the Council's business at high risk of fraud through participation in internal audits.	Ongoing	This work will 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	2-5	Shaun DUTTON	<b>ONGOING</b>

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			working relationship between the two teams.  CFIT continue to issue specific post-investigation reports recommending process / policy improvements that would provide a greater protection from fraud where appropriate.			
Blue Badge	Proactive fraud detection and deterrence exercise on Blue Badges	June 2022  July 2022  October 2022	Plain clothes exercise  Joint exercise with APCOA, this was not achieved due to the caseload of the team.  Plain clothes exercise. This exercise has been postponed to March 2023 due to workload commitments.	5	Shaun DUTTON	<b>01/07/2022</b>  <b>NOT ACHIEVED</b>  <b>DELAYED</b>
Blue Badge	Deliver Blue Badge enforcement update training to APCOA CEOs.	May 2022	The training has been written and this awaits a suitable opportunity to be delivered. Now complete.	1	Shaun DUTTON	<b>08/08/2022</b>
Benefits	Trial the new approach agreed with the Benefits Team to increase enforcement of Council Tax Reduction Scheme fraud without recourse to the DWP.	March 2023	In action.	1	Shaun DUTTON	<b>ONGOING</b>
Business Rates	Research project to determine best practice and effective methods of combatting Business Rates fraud.	March 2023	This project is waiting to be assigned.	2	TBD	<b>ONGOING</b>

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	Trail the joint working initiative aimed at addressing the issue of NNDR evasion by 'pop up' shops in the High Street (The High Risk Commercial Premises Protocol)	March 2023	This is now live.		Shaun DUTTON	<b>ONGOING</b>
Business Rates / Council Tax	Proactive review of second homes rented out as a business to evade Council Tax liability by claiming SBRR.	November 2022	Currently conducting research with other local authorities who have claimed success with this activity.	2	David GILL James COUSEN	<b>ONGOING</b>
Counter fraud	Develop a financial investigator capability.	March 2023	Funding has been agreed to train two officers in Financial Investigation.  One officer has now completed the Financial Investigator Course.  One officer has commenced on the pathway to training. This is dependent on course availability.	3  2	Shaun DUTTON  Caroline MERCIECA  David GILL	<b>April 2022</b>
Counter fraud	Recruit a Counter Fraud Investigator Apprentice	August 2022	The apprentice joined the team in October and will be starting formal training at the end of that month.	1	Shaun DUTTON	<b>03/10/2022</b>
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>Other opportunities to be determined through internal audits.</li> </ul>	March 2023	This is currently being developed.  Fraud Awareness training delivered to all South Essex Homes tenancy officers and support staff.	2	Shaun DUTTON  David GILL	<b>May 2022</b>

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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.	March 2023	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 David GILL	<b>ONGOING</b>
		June 2022	<p>Membership of CIFAS. 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. <b>This aspiration has been abandoned</b> due to the tight financial environment and pending the results of the above action.</p>	1	Shaun Dutton	<b>NOT ACHIEVED</b>

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	Undertake a Single Person Discount fraud drive that reduces fraudulent discounts, increases council tax revenue, and increases the council tax base.	March 2023	Research currently being undertaken to identify third party data analysis providers, and best practice from other local authorities who have experience with this.	1	David GILL	<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> <li>• Provision of a Financial Investigation service to other SBC teams and possibly other local authorities.</li> </ul>	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	

## Work Plan 2022/23 Calendar

Proactive detection and deterrence work (in bold) involves working long hours and usually results in a lot of processing and checking. These exercises have been planned over a period from Spring to Autumn to maximise longer daylight hours. This also provides a period later in the year to enable consolidation of the results and resulting investigations. The work that requires the most post-exercise processing (social housing) have been spaced out evenly through the active period to reduce the impact on the team's operational capacity.

2022	
April	
May	<ul style="list-style-type: none"> <li>Commence engagement with new starters at the point of induction.</li> <li><b>Proactive deterrence &amp; detection exercise: social housing</b></li> <li>Blue badge fraud training for APCOA CEOs - DEADLINE</li> </ul>
June	<ul style="list-style-type: none"> <li><b>Proactive deterrence &amp; detection exercise: blue badge fraud (plain clothes)</b></li> <li>Membership of CIFAS - DEADLINE</li> </ul>
July	<ul style="list-style-type: none"> <li><b>Proactive deterrence &amp; detection exercise: blue badge fraud (APCOA)</b></li> </ul>
August	<ul style="list-style-type: none"> <li><b>Proactive deterrence &amp; detection exercise: social housing</b></li> <li>Recruit a Counter Fraud Investigation apprentice - DEADLINE</li> </ul>
September	
October	<ul style="list-style-type: none"> <li>Anti Money Laundering Course – DEADLINE</li> <li><b>Proactive deterrence &amp; detection exercise: blue badge fraud (plain clothes) – postponed to March 2023</b></li> <li><b>Proactive deterrence &amp; detection exercise: social housing – postponed to March 2023</b></li> </ul>
November	<ul style="list-style-type: none"> <li>Publicity campaign to highlight International Fraud Awareness Week and declarations of interest</li> <li>Declarations of Interest promotion – DEADLINE</li> <li>Holiday lets review exercise – DEADLINE</li> <li><b>Proactive exercise to identify second homes rented out as a business</b></li> </ul>
December	
2023	
January	
February	
March	<ul style="list-style-type: none"> <li><b>Proactive deterrence &amp; detection exercise: social housing</b></li> <li><b>Proactive deterrence &amp; detection exercise: blue badge fraud (plain clothes)</b></li> <li>Joint working agreement with DWP – DEADLINE</li> </ul>



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	<ul style="list-style-type: none"><li>• Business Rates research project – DEADLINE</li><li>• Single Person Discount fraud drive – DEADLINE</li><li>• Business Rates High Risk Commercial Properties Protocol trial ends</li><li>• Council Tax Reduction Scheme new approach trial ends</li><li>• Financial Investigators training – DEADLINE</li><li>• False document identification training - DEADLINE</li></ul>
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