

Southend-on-Sea City Council

Finance & Resources Service

Executive Director Finance & Resources : Joe Chesterton

Civic Centre, Victoria Avenue, Southend-on-Sea, Essex SS2 6ER

Counter Fraud & Investigation Team

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Appendix 5 – DRAFT 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 and the backlog of cases is in remission.	5	Shaun DUTTON	ONGOING



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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.	March 2023	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. The lack of DWP engagement with local authorities is a subject of national concern and is being addressed through the Fighting Fraud and Corruption Locally group.	2	Shaun DUTTON Caroline MERCIECA	

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
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
		November 2022	Programme of publicity and talks to raise staff awareness of the importance of Declarations of Interest and how to make these.	2	Shaun DUTTON	
		November 2022	Publicity campaign to highlight International Fraud Awareness Week.	1	Shaun DUTTON	
		October 2022	Develop an Anti Money Laundering Awareness Course for all staff.	1	Shaun DUTTON	
		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	

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
Housing	Pro-active fraud detection and deterrence exercises on social tenancies.	May 2022 August 2022 November 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 James COUSEN David GILL	
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	
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 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.	2-5	Shaun DUTTON	ONGOING

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date	
Blue Badge	Proactive fraud detection and deterrence exercise on Blue Badges	June 2022	Plain clothes exercise	5	Shaun DUTTON		
		July 2022	Joint exercise with APCOA				
		October 2022	Plain clothes exercise				
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.	1	Shaun DUTTON		
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		
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		
	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	Currently being finalised.		Shaun DUTTON		
Counter fraud	Develop a financial investigator capability.	March 2023	Funding has been agreed to train two officers in Financial Investigation.	3	Shaun DUTTON		
			One officer has now completed the Financial Investigator Course.		2		Caroline MERCIECA
			One officer is waiting to start training. This is dependent on course availability.				David GILL

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
Counter fraud	Recruit a Counter Fraud Investigator Apprentice	August 2022	A business case has been submitted to recruit and train a Fraud Investigator Apprentice based on a 2 year fixed term training contract with an option for a further 2 year fixed term Junior Investigator contract.	1	Shaun DUTTON	
Specific teams	Training in specific counter fraud techniques to be delivered to identified teams: <ul style="list-style-type: none"> • False document identification • Other opportunities to be determined through internal audits. 	March 2023	This is currently being developed.	2	Shaun DUTTON David GILL	

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
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.	<p>March 2023</p> <p>TBD</p> <p>June 2022</p>	<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 is being planned with a potential supplier of internet data mining services.</p> <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.</p>	2-4	Shaun DUTTON David GILL	ONGOING

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Area	Activity	Target date	Current status	Resource requirement (officers)	Responsible officer	Completed date
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 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	

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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"> Commence engagement with new starters at the point of induction Proactive deterrence & detection exercise: social housing Blue badge fraud training for APCOA CEOs – DEADLINE
June	<ul style="list-style-type: none"> Proactive deterrence & detection exercise: blue badge fraud (plain clothes) Membership of CIFAS – DEADLINE
July	<ul style="list-style-type: none"> Proactive deterrence & detection exercise: blue badge fraud (APCOA)
August	<ul style="list-style-type: none"> Proactive deterrence & detection exercise: social housing Recruit a Counter Fraud Investigation apprentice – DEADLINE
September	
October	<ul style="list-style-type: none"> Anti Money Laundering Course – DEADLINE Proactive deterrence & detection exercise: blue badge fraud (plain clothes)
November	<ul style="list-style-type: none"> Publicity campaign to highlight International Fraud Awareness Week and declarations of interest Proactive deterrence & detection exercise: social housing
December	
2023	
January	
February	
March	<ul style="list-style-type: none"> Joint working agreement with DWP – DEADLINE Business Rates research project – DEADLINE Business Rates High Risk Commercial Properties Protocol trial ends Council Tax Reduction Scheme new approach trial ends Financial Investigators training – DEADLINE False document identification training – DEADLINE