

**Benefits Division**  
**Anti-Fraud Strategy**



*Epping Forest District Council*

## **Introduction**

For many years the Council has been implementing and developing measures to reduce the risk of benefit fraud in order to protect public funds. An effective anti-fraud strategy always puts prevention of fraud at its core. It is the responsibility of management at all levels to ensure that adequate controls are in place to prevent and detect fraud.

The Council's benefits anti-fraud strategy represents a commitment to protect public funds and to ensure benefits are paid to those who have a true entitlement to them. The Council has set individual officers demanding targets to demonstrate its commitment to reducing benefit fraud. Targets will be monitored within the Benefits Business Plan.

## **Standards**

The Council will deliver a professional and efficient benefits investigation team that provides value for money to the tax payer. Each officer will be an accredited counter fraud officer and be authorised under Section 110 of Social Security Administration Act 1992.

All investigations will be undertaken in accordance with the Criminal Procedures Investigation Act 1996, Data Protection act 1998 and Social Security Fraud Act 2000. Interviews under caution will be compliant with Police and Criminal Evidence Act 1984. The Council, where appropriate will seek to utilise The Proceeds of Crime Act to recover monies fraudulently obtained.

As well as adhering to the general Epping Forest District Council Code of Conduct for staff and the provisions of the law, each member of the Investigation team is also subject to a further Code of Conduct for Investigation Officers.

## **Administration and equipment**

The structure of the Investigation & Intervention team is shown in appendix 1. It is part of the Benefits Division and is managed on a day to day basis by the Investigation & Interventions Manager, supported by two Senior Officers, one responsible for the Investigation team and the other responsible for the Interventions team. The Benefits Division operates within a paperless environment. The investigation case file documents are held electronically within information@work and recorded on FIMS, the fraud management IT system. The council has provided a tablet pc and digital camera for each Investigation Officer and Visiting Officer. The team has its own PACE tape machine and copier as well as a secure fax and dedicated fraud hotline. Information about the team, benefit fraud and an on-line referral (Report of suspected fraud) can be found on the council's website, [www.eppingforestdc.gov.uk](http://www.eppingforestdc.gov.uk). The team also utilise the Government's secure GCSX email network ensuring secure communication and transfer of data between the Council and other Government departments.

## **Fraud prevention**

The Council will provide fraud awareness training to all Benefits staff within a month of commencement of employment. Fraud awareness training will also be provided to Revenues, Housing, Planning and Environmental Health staff as appropriate to their roles.

In order to prevent benefit fraud within private sector tenancies, the Council undertakes a Land Registry search to check the ownership of a property on receipt of a new claim. The council also maintains data quality exceeding 99% within Academy and information@work by carrying out a monthly data check on names, dates of birth and national insurance numbers to ensure effective data matches.

The council will undertake 2400 in claim interventions per year on standard Housing Benefit and Council Tax Benefit claims. This is likely to include 640 home visits.

## **Fraud detection**

As well as providing the appropriate training, the Council is also committed to supporting the Investigation team to achieve continual improvement in both fraud detection and the methods used to achieve it. The team focuses on intelligence led investigations in order to provide both value for money and maximise the prospect of uncovering fraudulent claims. In order to facilitate this, a number of IT solutions are used by the investigation team with some examples being:

- DWP Customer Information Service
- Land Registry portal
- Experian investigator on-line credit searching facility
- Home Office Identity & Passport Service
- Companies House.
- Various genealogy websites

The Investigation team also utilises the services of The National Anti Fraud Network (NAFN), of which Epping Forest District Council are corporate members. NAFN provide the team with a number of information and intelligence gathering services as well as providing the team with information on local and national fraud trends and alerts. Due to the team's active involvement with NAFN, it will also act to ensure that any fraud alerts that may have an impact on other Services within the council get passed on to the relevant Service.

The Investigation team will strive to undertake 500 benefit fraud investigations per year. This will include 240 home visits to confirm customer's personal circumstances and residence. The team will also where appropriate, visit employers, letting/estate agents or any individual or organisation connected to an investigation. Both formal and informal interviews of suspects and witnesses are also undertaken at the Civic Offices in Epping, although with each officer being mobile, interviews may also be carried out in other locations.

The Investigation & Interventions Manager will risk assesses each referral of suspected fraud with priority given to the following categories:

- Residency checks/sub lets
- Contrived tenancies
- Low earners
- Undeclared partners (LTAHAW)
- Undeclared work
- Undeclared capital

The team works in partnership with DWP, other Councils, Essex Police, the Council's Legal & Administration Service and other Council Services such as Housing, Revenues, Planning and Environmental Health. The Investigation team is also an active member of The Essex and Herts Investigation Group, which promotes liaison and closer working with, not only other local authorities in Essex and Herts, but also other investigative bodies such as DWP, Her Majesty's Revenue & Customs, Trading Standards, the Police etc. The Council operates the 'Do not redirect service' provided by Royal Mail.

The Council provides the DWP with data downloads each month for data matching purposes. The Interventions team manages Housing Benefit Matching Service (HBMS) referrals and other data scans. The Investigation team manages matches received from the Audit Commission's National Fraud Initiative (NFI).

## **Sanctions**

Epping Forest District Council is committed to a robust anti-fraud stance and has a clear policy on taking action against people who are found to have committed benefit fraud.

The Council prosecutes all appropriate cases, in accordance with the Epping Forest District Council Prosecution Policy and the Code for Crown Prosecutors, with each case being constantly reviewed to ensure compliance with the latter. In order to provide an ongoing commitment to quality, the Council will use their own legal services to bring these cases to court. The Council will also prosecute on behalf of DWP and other Councils where appropriate. The Council also administers formal cautions and administrative penalties in accordance with both the Epping Forest District Council Prosecution Policy and the appropriate regulations.

## **Publicity**

As a means of both publicising the work of the Investigation team and in order to act as a deterrent, the Council will routinely issue a press release following each successful prosecution. The Council will name prosecuted benefit offenders in the local press. At the same time, Members will be notified in the Members' Bulletin.

## **Overpayments**

Fraudulent overpayments will be recovered via the Overpayments team situated within the Benefits Division. All options for recovery will be considered, including placing charges on a property and recovery through the Proceeds of Crime Act.

## **Register of Interests**

A Register of Interests is maintained for all Benefit staff who have friends or family members who are benefit claimants living within the District. Officers declaring an interest are made aware of their responsibilities and that they are not supposed to carry out any processing on those claims. Senior Officers of the Benefits Division will undertake regular checks on all properties in the Register of Interests to ensure compliance.

### Structure of Investigation & Interventions team

