

# **Corporate Services Housing Benefit and Council Tax Reduction Fraud Prevention and Investigation Business Plan 2015/16**



## **1. Introduction**

- 1.1 The Council's Corporate Services' – Revenues and Benefits Section administers Housing Benefit on behalf of the Department for Work and Pensions (DWP).
- 1.2 From 1 April 2013 Council Tax Benefit (CTB) was abolished as a DWP benefit and replaced with Council Tax Reduction (CTR) which is administered by the Council on behalf of the Scottish Government.
- 1.3 The prevention and investigation of fraudulent claims are important aspects of a secure and effective benefits service. Counter-fraud activities help to protect public funds by ensuring that fraudulent claims are identified and sanctions are applied where appropriate.
- 1.4 The Fraud Prevention and Investigation business plan provides an opportunity to set out the aims and objectives of the benefits service and to provide key deliverables against which performance can be measured, monitored and reported. It should be read in conjunction with the main Housing Benefit and Council Tax Reduction Business Plan 2015/16.

## **2. Housing Benefit and Council Tax Reduction - service structure and aims**

- 2.1 The Council structure within which Housing Benefit and Council Tax Reduction operates is as follows:
  - Corporate Services;
  - Finance Service;
  - Revenues and Benefits Section.
- 2.2 The aims of the benefits fraud investigation function is to:
  - 2.2.1 Take measures to help prevent benefit fraud;
  - 2.2.2 To promote benefit fraud awareness;
  - 2.2.3 Detect and pursue benefit fraud;
  - 2.2.4 Pursue benefit fraud using all available sanctions;
  - 2.2.5 Treat all fraud cases fairly, consistently, without discrimination and taking into consideration all relevant factors.

- 2.3 The aims of the benefits fraud investigation function will be achieved by:
- 2.3.1 Continuously developing and enhancing systems to prevent, detect and investigate benefit fraud;
  - 2.3.2 Monitoring and reviewing recent and past investigations;
  - 2.3.3 Ensuring that fraud investigation staff receive DWP Professionalism in Security (Pins) training;
  - 2.3.4 Working together with counter fraud staff in other agencies, most specifically with the DWP Fraud Investigation Service (FIS);
  - 2.3.5 Educate other stakeholders about fraud awareness and counter fraud activities;
  - 2.3.6 Encouraging the reporting of suspicions of fraudulent benefit activity.

### **3. Fraud prevention strategy**

- 3.2 A Housing Benefit and Council Tax Benefit – Anti-Fraud policy, plus a Housing Benefit and Council Tax Benefit – Fraud Prosecution policy were approved at a meeting of the Policy & Resources Committee in June 2009 and can be viewed on the Council's website at [http://www.orkney.gov.uk/Service-Directory/B/Benefit-Fraud\\_2.htm](http://www.orkney.gov.uk/Service-Directory/B/Benefit-Fraud_2.htm)
- 3.3 To achieve the aims of and objectives of the benefits fraud investigation the following strategies will be utilised:
- 3.3.1 To maintain and review internal fraud procedures and practices to ensure that fraud activities continue to comply with legislation and good practice;
  - 3.3.2 To monitor fraud performance by reviewing cases and analysing investigations and outcomes;
  - 3.3.3 Provision of accurate and up to date information on the Council's website, including publicity of successful sanctions, helping to raise the profile of the fraud team;
  - 3.3.4 Provision of leaflets to stakeholders, including how to report suspicions of benefit fraud;
  - 3.3.5 Provision of fraud awareness and prevention training to stakeholders;
  - 3.3.6 Maximising opportunities for investigating fraud through recognised proactive initiatives such as:
    - The DWPs' Housing Benefit Matching Service;

- Audit Scotland’s National Fraud Initiative;
- Real Time Information – earnings data matching cross-referencing internal benefits records;
- undertaking joint working with the Fraud and Error Service;
- undertaking home visits to help deter and detect fraud;
- operating the Royal Mail’s “Do Not Redirect Service” ;
- Membership of the National Anti-Fraud Network (NAFN); and targeting of high risk benefit claims;
- Membership of the Scottish Local Authorities Investigators Group.

3.3.7 To undertake an annual review of the Housing and Council Tax Reduction – Fraud Prevention and Investigation Business Plan.

#### **4. Single Fraud Investigation Service**

- 4.1 As part of the UK government’s welfare reform programme the Single Fraud Investigation Service (SFIS) was been introduced from April 2013. This brings together the combined expertise of the Welfare Benefit Fraud investigation work undertaken by DWP Fraud Investigation Service (FIS), LA Benefit Fraud Investigators and HMRC in relation to Tax Credits into a single service.
- 4.2 From 1 September 2015 the Council’s responsibility for investigation Housing Benefit fraud will transfer to SFIS. The Council will remain responsible for accepting referrals and assisting SFIS with their investigations. The Council also retains responsibility for investigating Council Tax reduction fraud and error.

#### **5. Maintaining skilled employees**

- 5.1 Training is an essential element of the service to ensure that investigation of benefit fraud is undertaken in a professional manner and to maximise outcomes.
- 5.2 It is considered a priority that at least one member of staff has attained the DWP Pins training qualification. In 2014/15 there are three fully qualified members of staff.
- 5.3 It is considered a priority that at least one member of staff is a qualified DWP Pins 9 Authorised Officer to enable information requests to be made to employers and third parties. In 2014/15 there are two members of staff who are Authorised Officers.

- 5.4 Although the responsibility for investigating HB fraud will transfer to SFIS on 1 September 2015 the Council still require to retain skilled investigative staff to assist in the process.
- 5.5 A Staff Contingency Strategy is aimed at ensuring critical absences are managed effectively to ensure that sufficient resources are available to carry out all key benefits service activities.

## **6. Performance reporting**

6.1 The regular reporting of performance is an essential component of service delivery and provides an opportunity to:

6.1.1 Challenge under performance;

6.1.2 Recognise and give credit where performance meets or exceeds expectations;

6.1.3 Gain assurance that the service is operating effectively, efficiently and economically.

6.2 Targets will be set to measure performance levels for each financial year. These will be set taking into account past performance levels and the expectations of the level of service that can be attained. Measures for 2015/16 are shown at Appendix 1 of this document.

Document reviewed and updated – April 2015

**Performance reporting measures**

1. The number of fraud investigations raised in the year.

Year	Target	Actual Performance
2009/10	110	183
2010/11	130	153
2011/12	130	153
2012/13	130	190
2013/14	130	128
2014/15	130	115
2015/16	130	

2. The % of fraud referrals sifted within 10 working days of receipt.

Year	Target	Actual Performance
2009/10	95%	100%
2010/11	95%	93%
2011/12	95%	97%
2012/13	95%	100%
2013/14	95%	97%
2014/15	95%	100%
2015/16	95%	

3. The % of fraud investigations started within 10 working days of sifting.

Year	Target	Actual Performance
2009/10	95%	97.3%
2010/11	95%	100%
2011/12	95%	100%
2012/13	95%	98%
2013/14	95%	100%
2014/15	95%	96%
2015/16	95%	

4. Number of Interviews Under Caution

Year	Target	Actual Performance
2009/10	10	21
2010/11	14	14
2011/12	14	15
2012/13	14	5
2013/14	10	5
2014/15	5	4
2015/16	5	

5. Number of Sanctions

Year	Target	Actual Performance
2009/10	4	8
2010/11	6	10
2011/12	6	6
2012/13	6	5
2013/14	4	4
2014/15	4	2
2015/16	4	