

DUNDEE CITY COUNCIL

REPORT TO: FINANCE COMMITTEE – 14 JUNE 2004
REPORT ON: COUNTER-FRAUD REPORT 2003/2004
REPORT BY: DEPUTY CHIEF EXECUTIVE (FINANCE)
REPORT NO: 367 - 2004

1.0 PURPOSE OF REPORT

1.1 This report details the Council's Housing Benefit and Council Tax Benefit Counter Fraud Activity for 2003-2004.

If the report is adopted by Committee a supporting Counter Fraud Report 2003-2004 Explanatory Information document will be placed in the members lounge.

2.0 RECOMMENDATION

2.1 The Committee is asked to note the contents of the report and adopt the procedure of quarterly Counter Fraud reporting as recommended by the Benefit Fraud Inspectorate.

3.0 FINANCIAL IMPLICATIONS

None

4.0 LOCAL AGENDA 21 IMPLICATIONS

None

5.0 EQUAL OPPORTUNITIES IMPLICATIONS

None

6.0 CONSULTATION

6.1 The Chief Executive and the Depute Chief Executive (Support Services) have been consulted on this report.

7.0 BACKGROUND PAPERS

7.1 No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than containing confidential or exempt information) were relied on to any material extent in preparing the above report.

D K DORWARD
DEPUTE CHIEF EXECUTIVE

DATE



COUNTER FRAUD PERFORMANCE REPORT

2003/2004

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COUNTER-FRAUD SECTION PERFORMANCE 2003-2004

PREFACE

In July this year, the Council was subject to an inspection by the Benefit Fraud Inspectorate (BFI). The resulting report, published on 05 February 2004, included various recommendations, one of which was to make more Counter-Fraud operational information more freely available to Elected Members and Council Employees.

To address this recommendation, quarterly reporting has been introduced, tailored to meet the set requirements of both the Performance Standards Framework and the BFI Report.

In order to assist any reader who is not conversant in Counter-Fraud terminology, a supporting Explanatory information document has been provided as Appendix B to this report.

INTRODUCTION

There has been a change in emphasis in Counter-fraud work over the last few years. Previously our role was identifying fraudulent claims, withdrawing the benefits that claimants were not entitled to and recovering the overpaid benefit. However, the emphasis is now on being proactive to identify the more serious Benefit Fraud Offenders with a view to taking prosecution action against the perpetrators. This report provides a current position statement of the Counter-fraud Section.

Although it is obviously important to note the positive progress of Counter-Fraud work, it is acknowledged that there is still a lot of work to be done and this is demonstrated throughout the report as appropriate.

COUNTER-FRAUD FINANCIAL REPORT – 2003/2004

Subsidy Income	SAFE Income Security Against Fraud & Error Incentive Reward Income)	Administrative Cautions Income	Administrative Penalties Income	Prosecutions Income	Annual Income
£98,668	£11,161	£3,600	£44,000	£3,000	<u>£160,429</u>

Generated from the following three areas:

1. BENEFIT OVERPAYMENTS - The subsidy level quoted above is derived from taking 40% of the actual fraud overpayments established by the Counter-Fraud Section as shown below

Council Tenants Housing Benefit	Private Tenants Housing Benefits	Council Tax Benefit	Income Support	Job Seeker's Allowance	Other Benefits	Total
£111,792	£63,860	£66,202	£4,816	£00.00	£00.00	£246,670

2. SECURITY AGAINST FRAUD & ERROR INCENTIVE REWARD INCOME

Council Tenants Housing Benefit	Private Tenants Housing Benefits	Council Tax Benefit	Department for Work and Pensions Benefits	Total
£3,970	£4,577	£2,235	£379	£11,161

3. SANCTION INCOME

Administrative Caution Income			Administrative Penalties Income			Successful Prosecutions		
No of cases	Incentive reward per case	Income	No of cases	Incentive reward per case	Income	No of cases	Incentive reward per case	Income
3	£1,200	£3,600	2	£1,000	£2,000	1	£3,000	£3,000
			35	£1,200	£42,000			
Total	£50,600							

Subsidy Income

The subsidy payment generated from the Counter-Fraud Section has reduced from £113,723 in 2002/3 to £98,668 in the financial year 2003/4.

This reduction is likely to continue and is due to the changed emphasis of the Section as noted in the introduction. In order to investigate cases to prosecution, each case must be treated as a prosecution case from the onset. In the past, with a small number of prosecution suitable cases being referred, the Section have been able to investigate quite a high number of cases by having different procedures depending on the assessment of the case. The majority of cases fell into the category of being possible fraud overpayments but where the circumstances would be unlikely to result in the case being referred to the Procurator Fiscal for prosecution. This resulted in many cases being investigated and closed at an earlier stage and therefore generated a higher amount of overpayments. However, the number of cases being referred which are suitable for prosecution has increased and the Counter-Fraud Officers are now spending all their time concentrating on these cases and can no longer deal with the 'quick hit' cases. This has had the effect of a reduction in our subsidy income.

The reasoning behind the increase in good referrals is probably down to a range of things such as our twice-yearly publicity campaigns, a programme of Fraud Awareness Training Sessions and a noticeably higher public profile on benefit fraud.

SAFE – Security Against Fraud & Error Income

The Counter-Fraud Section is currently identifying 3% of all revenues WIBs, which is a reasonable level given that there are only the four officers generating this percentage. The WIB income resulting from the Counter-Fraud operations amounted to £2,565 during 2002/2003 but this has now increased to £11,161 for the financial year 2003/2004. Although the figure has risen from the previous financial year, this income is likely to be adversely effected by the Sections need to target their resources towards the Prosecution Cases. This means that there will be fewer investigations undertaken and so will result in reduced SAFE income. However, it is hoped that the growing level of sanction financial incentive rewards will balance this out.

Administrative Cautions Income

Administrative Cautions were introduced in Scotland from October 2002 and there was a lengthy delay before ratified procedural guidelines were issued to Scotland's Counter-Fraud Sections. This is reflected in their being no Administrative Caution income until 2002/3.

These cautions are suitable for only clear-cut cases, where the individual admits the offence outright and the period of the offence is relatively short. Not surprisingly, the majority of benefit fraud cases do not result in a straight admission by the claimant and there are also very few cases where the overpayment is below the financial threshold for this form of sanction which is £400. To date there has only been three Administrative Cautions resulting in income of £3,600 during 2003/4.

Administrative Penalty Income

The majority of our cases fall into the Administrative Penalty criteria, which is clearly reflected in the income generated from this form of sanction. With 12 cases generating an income to the Council of £12,000 during 2002/2003, rising to 37 cases generating £44,000 in the financial year 2003/2004 this is a good indicator that our procedures for in-depth investigations are now beginning to bear fruit.

Prosecution Income

The first successful prosecution case has now been realised generating an income of £3,000 as an incentive reward from central government. There Prosecuting Benefit Fraud Offenders is the main thrust of the Counter-Fraud Sections work now and currently there is another case due to be reported to the Procurator Fiscal shortly with more cases in the pipeline. This quarterly reporting will document the progress of our prosecution cases.

Annual Income & Overall Income

The Overall Income generated by the Counter-Fraud Section for 2003/2004 stands at £160,429.

This is a substantial amount and one that the Counter-Fraud Manager hopes to increase. However, the make-up of the income should, as has already been noted, change to reflect less Subsidy and SAFE income but increased Sanction Income over time.

COUNTER-FRAUD POLICY

The Council's Anti-fraud & Corruption Policy documents the Council's strategy in tackling Fraud.

The annual review of the policy is currently being undertaken by the Counter-Fraud Manager as it is necessary to update the content to reflect changes in how the Council tackle benefit fraud. This current revision will include the Council's recent adoption of the Verification Framework, where claimants are required to show evidence of their circumstances in support of the information contained within their application for benefit form. There are also updates for changes in how the Counter-Fraud Section treat individuals, to build in a policy to ensure that steps are being taken to prevent unnecessary distress to the public when possible malicious allegations are received.

In reviewing the recommendations contained within the BFI Report, it is likely that a number of revised or new policy documents will be required. To this end, it is expected that in the near future a Committee Report to the members will be prepared to incorporate these new or revised policy documents and it is intended to include the revised Anti-Fraud & Corruption Policy with this report.

As a requirement noted by the BFI, all investigations are monitored against the Council's Prosecution Policy to ensure consistency in actioning.

PERFORMANCE STANDARDS

The Performance Standards are a method by which Councils can self-assess their performance, however, the BFI completed a Performance Standard assessment on the Council in November 2003 reflecting that the Counter Fraud Section was attaining only 52% of standard. However a recent assessment has shown that the Section are now operating at 88% of standard and work is being done to raise this level further. However, there are some items where the Council may not be able to meet the standards, for instance in the Counter Fraud Do Not Redirect item, to meet this standard there is an underlying difficulty of the special envelopes not being compatible with some enveloping machines and the cost to meet this standard may outweigh the advantage of one more percentage point in the standards.

BENEFIT FRAUD INSPECTORATE

The BFI identified a number of strengths since their previous inspection in 1999 but also noted recommendations for preventing weaknesses found in the Counter-Fraud work. While the full report can be viewed on the BFI website, the findings are roughly as follows :-

Summary of Strengths

The introduction of significantly developed strategies for countering fraud and its counter-fraud operation

Actively seeking to apply the full range of sanctions

Significant improvements in many elements of counter-fraud work

Summary of Recommendations

Requirement to report on Counter-Fraud to Elected Members and council employees

To introduce management checks across the full range of fraud activities

Increase analysis of fraud activities

Increase Fraud Awareness Training throughout the Council

Reduce delay in investigations

Increase standard of corroborative evidence

Of the 16 major recommendations quoted by the BFI, 13 have been implemented and 3 are being actioned but have yet to reach completion, caution is being used to ensure that we are not implementing any changes unless it is beneficial, cost effective and operationally feasible with the given resources.

RECOVERY OF BENEFIT FRAUD OVERPAYMENTS

While the main role of the Counter-Fraud Section is to identify benefit offences and take appropriate action, there is also a requirement placed on us by the BFI to follow-up on any cases where a proven fraud case has resulted in an overpayment of benefit.

The Revenues Division has recently restructured to free up resources to take Counter-Fraud Work forward and this has meant that the Overpayment Section who recovery benefit fraud benefit overpayments now comes under a different management line.

In order to ensure that all these overpayments are being recovered, the Counter-Fraud Officers retain their cases as live investigations up until the point when recovery is in place, and, as a further check, the Counter-Fraud Manager is now running monthly reports on the benefit fraud overpayments, forwarding these to the Recovery Section who note what action is being taken in each case. This information is maintained and will be used for reporting purposes to establish how effective our recovery of benefit fraud overpayments is.

Recovery of Fraud benefit overpayments are prioritised over other benefit debts.

At the time of reporting, Housing Benefit recovery on Fraud cases is showing that approximately 7% have been fully recovered and 20% have automatic deductions from ongoing benefit entitlement in place. The remaining debts are being actively pursued for recovery.

The quarterly reporting will document our recovery levels and it is hoped that in the not to distant future there will be compensation orders from the courts with our prosecutions to recover fraud overpayments. However, it is likely that there would have to be evidence of savings or assets before this would be a reasonable action for the courts to take but it will be added to the Procurator Fiscal reports whenever it is a viable option.

COUNTER-FRAUD REFERRALS

Analysing the referrals coming into the Counter-Fraud Section has been highlighted by the BFI as being a very important area. Although there was some analysis done previously in this area, the BFI recommendations have prompted a more in-depth look at our referrals such as looking at the volume, sources, volume coming from each individual source and the type of frauds being referred.

This analysis has been done back to the start of 2003 and will now form and ongoing part of the section assessment process.

The overall assessment is that we are doing okay but we could be doing a lot better. The main way to encourage referrals is through continued Fraud Awareness training sessions. Unfortunately, this is very time consuming work both in the necessary continued updating of the information contained in the presentations, arranging all the training sessions and the actual presenting. A full program of Fraud Awareness is in hand for Revenues, Housing and the Education Department staff where appropriate and the format of the presentations is also being assessed for Intranet and Internet suitability.

Overall Referrals

Analysis of our referrals overall confirms that there is three main sources, the Council, the Department for Work and Pensions and the public.

The BFI have set the Council the recommendation to place targets on the number of referrals that should be received from each source or individual within that source. However, this is only possible within the council as we have no control over outside organisations and their referral rates.

If time and resources allow, it is planned to do outreach work to the other organisations that already refer cases to us and if possible to others that could be referring cases to us. However, with regard to those

sources that we can exert some control over in our attempts to encourage an increase in referrals, such as our employees, it is planned to extend our Fraud Awareness Sessions to incorporate all Council employees through the Intranet and Corporate Induction Package.

As for targets, these will have to be looked into in more detail. It is likely that targets will only be workable within the Revenues Division and it will be necessary to firstly assess the levels of referrals from each section within Revenues with the view of introducing realistic targets to aim for.

Council Referrals

At the current time, there have been four council departments referring cases, Revenues, Housing, Education and the Environment and Consumer Protection departments.

Analysis reflects the need to do more Fraud Awareness work to encourage many more Council departments to assess whether any of the information they are working with is suitable for possible benefit fraud referrals. However, the Revenues Division is appreciative of the referrals that are being received from other Council Departments.

Revenues Referrals

It is clear, as would be expected, that it is those staff that are working within the benefits environment that are referring the majority of cases. This is a good indication that the Fraud Awareness work that has been done up to now, coupled with the high calibre of training received by the staff within the Revenues Division is bearing fruit.

Regarding setting referral targets for staff within Revenues, at the current time, all our attention is being centred on maintaining the current level of work output, keeping the flow of work up to date so our benefit applicants are getting their benefits as soon as possible which is more of a priority than setting targets for referring cases to the Fraud Section. As long as all discrepancies are being referred to the Fraud Section as they are being identified then this is a more beneficial aim and one that will assist in ensuring that the referrals received are good referrals when the referrer has identified a real possibility of benefit fraud as opposed to achieving a high rate of referrals that could have very little potential.

Fraud Types

There is a wide range of case types that are referred to the section. In order of volume of referrals they are: -

- Living Together - Where the benefit claimant has knowingly claimed benefits as a single person while actually living with a partner
- Non-Residency - Where the benefit claimant has knowingly claimed benefits at a property they are not living at
- Private Earnings - Where the benefit claimant has knowingly failed to declare their or their partner's private earnings
- Multiple Fraud Types - Where a referral contains information relating to more than one type of fraud
- Private Superannuation - Where the benefit claimant has knowingly failed to declare their or their partner's private pension from a previous employer
- Non-dependants - Where the benefit claimant has knowingly failed to declare that an adult – not related nor a partner – is living in their household
- Savings - Where the benefit claimant has knowingly failed to declare their or their partner's savings
- Council Superannuation - Where the benefit claimant has knowingly failed to declare their or their partner's council pension
- Under Applicable Amount - Where the income reported by the benefit claimant is below the amount they should have if they had applied for the available benefits

Contrived Tenancy	-	Where the benefit claimant has knowingly applied for benefit with a false or non-commercial tenancy agreement for the property they reside in
Capital	-	Where the benefit claimant has knowingly failed to declare that they have capital assets other than property ownership
Property Ownership	-	Where the benefit claimant has knowingly failed to declare that they own property
Tax Credits	-	Where the benefit claimant has knowingly failed to declare that they or their partner receives Tax Credit income
Landlords	-	There are many types of fraud that involve landlords from submitting benefit claims for fictitious tenants to colluding with tenants or others to knowingly claim benefit that the 'tenant' is not entitled to
Rental Income	-	Where the benefit claimant has knowingly failed to declare that they receive Rental Income from property
Students	-	Where the benefit claimant has knowingly failed to declare studentship or student bursary for any of the residents in their household
Council Earnings	-	Where the benefit claimant has knowingly failed to declare that they or their partner receive earnings from the council

Referrals reaching sanction action

Analysis of our referrals has shown that our sanction action – that is levying Administrative Cautions, Administrative Penalties or reporting to the Procurator Fiscal – has come from a range of sources. Naturally the Fraud Section is generating the highest level at 67% because they are becoming more and more proactive to establish high-risk areas that do result in a better sanction return. However, it is good to know that the public have referred 14% of our sanction cases with the Revenues Benefit Processing staff following close behind with 13%, our Visiting Officers 3% which is the same level of sanction referrals received from the Department for Work and Pensions.

All named referrers receive confirmation whenever their referrals result in a successful sanction being levied on the claimant.

COUNTER-FRAUD IMPACT ON BENEFIT PROCESSING

While any areas of possible better practice or benefit processing weaknesses have always been referred onto the benefit managers, no records were maintained. However, since the BFI highlighted the importance of maintaining a record of how Counter-Fraud work impacts on benefit processing, the situation has been monitored.

Since November 2003 there have been six instances where the work being generated from the Counter-Fraud Section has highlighted areas where procedural changes could improve service. This has involved procedures within Revenues but also our interaction with the Department for Work and Pensions and the Pensions Service. The areas highlighted are identifying weaknesses in our administration but also where there are any weaknesses found in our stakeholder organisations.

REFERRAL QUALITY ANALYSIS

Analysing referrals at the point of receipt is one of the most effective measures for any Counter-Fraud Section. It is needed to make the most efficient use of the resources to hand.

In a perfect world we would all choose to fully investigate all referrals that are received, but unfortunately, the level of resources required to do this would not be practical. Even if it were a feasible option from a resources point of view, it would be unlikely to produce a high enough increase in proven fraud cases to justify taking up the resources. This is due to the high number of referrals received that at that point either do not contain enough information or substance to merit undertaking an investigation or when the case is assessed by the

Counter-Fraud Officer an investigation is found not to be warranted. This secondary assessment stage takes into account reviewing the information contained with the Council's records, the benefit history and the likelihood of the case culminating in a successful sanction etc.

All referrals are assessed at the point of receipt. There is an internal procedure for this that is being continually reviewed to do all that we can to provide the Officers with the cases most likely to reach a successful sanction. There are many tiers of Referral Quality Assessment (RQA) but the main ones are RQA A, which are the cases where the content of the referral is of a high quality, RQA B, still good quality but a little less substance and RQA C which are cases that are actioned but only by the Fraud Team if resources allow. These cases are normally actioned by referring to the Benefit Accounts Sections, the Visiting Liaison Section or closed due to insufficient information. The referrals forwarded onto the Visiting Liaison Section can be resurrected by the Fraud Team should the visit to the claimant provide further information that results in there being sufficient substance to the case information to make it a viable investigation case.

A current breakdown is as follows: -

Outcome	RQA A	RQA B	RQA C
Fraud Proven	6%	3%	3%
Police Investigating	0%	0%	0.5%
DWP Investigating Under our Service Level Agreement with the DWP, the organisation who commenced their investigation first carries on with the investigation and also where there is only likely to be a DWP Overpayment involved the case is referred on	2%	6%	0.5%
Not Investigated / Not sufficient basis to investigate	35%	39%	30%
Not Proven This demonstrates the level of referrals where fraud has not been found after investigating the allegation contained within the referral	32%	28%	15%
Passed to the Accounts Section	18%	4%	8.5%
Passed to Visiting Liaison Section	7%	20%	42.5%
Total	100%	100%	100%

RQA A - Out of the referrals received that were assessed as having the best potential, only 38% were actually suitable for investigation by the council (Fraud Proven & Not Proven categories) once the Referral Quality Assessment procedures had been applied. From this 16% have resulted in a benefit offence being proven.

RQA B - Out of the referrals received that were assessed as having the best potential, only 31% were actually suitable for investigation by the council (Fraud Proven & Not Proven categories) once the Referral Quality Assessment procedures had been applied. From this 10% have resulted in a benefit offence being proven

RQA C - Out of the referrals received that were assessed as having the best potential, only 18% were actually suitable for investigation by the council (Fraud Proven & Not Proven categories) once the Referral Quality Assessment procedures had been applied. From this 17% have resulted in a benefit offence being proven

Current Procedures

Our Referral Quality Assessment procedures have been fully overhauled in the last few months. The changes should start to have a noticeable effect in the percentage of proven cases towards the end of the

year. This delay is due to the length of time it now takes from first receipt of the referral to the end of the sanctioning process as every case must be investigated up to prosecution standard.

MANAGEMENT CHECKS

Throughout the BFI Report, the need for comprehensive management checking has been highlighted. In light of this, a major program of checking has been implemented in the Counter-Fraud Section, which is documented in detail in the accompanying Supporting Explanatory Information.

DATA MATCHING & COUNTER-FRAUD

The BFI recommends that all data-match referrals be assessed for appropriate action within 14 days of receipt.

From April, this standard will be applied to our data-matching referrals and the percentage success rate reported along with details of the number of cases where benefit fraud is found to be proven and where sanction action is taken.

As a check on current overall performance, when this standard was applied to all our referrals, the result was a 78% success rate in this standard.

This is seen as a good practice guide on how we are dealing with our referrals overall and will continue to be monitored and reported.

COUNTER-FRAUD FRAUD AWARENESS

The Counter-Fraud Section already carryout a program of Fraud Awareness training sessions within the Council.

To date training sessions have been provided for Revenues, Housing and Education. However, with the Council now embracing the benefit Verification Framework Scheme, which ensures that benefit claimants provide verification of their financial details in support of their benefit claims, the Counter-Fraud Fraud Awareness program has had to be assessed to ensure that the requirements relating to fraud awareness are implemented.

Induction Program

A new half-day program for all new employees to the Revenues Division has been introduced. Within the first two weeks of starting with Revenues, each new start will spend a morning with the Counter-Fraud Section. The program consists of:

- Meeting the Counter-Fraud Section
- Initial introduction to Fraud Awareness Powerpoint Presentation
- Handout of the Anti-Fraud & Corruption Policy
- Listening to an interview under caution followed by a chat about it with one of the Counter-Fraud Officers – name and address details of the benefit claimant removed
- Spending time with each Benefit Assistant to find out what they do in their Counter-Fraud Officer supporting role in the Section

There have now had to be three different programs put in place in order to be compliant with the Verification Framework –

Existing Revenues Division Staff Program

Non-Revenues Existing Council Employee

General Public Program

Each program covers roughly the same information but is tailored to suit the specific audience, but overall the program consists of the following information :-

- Set up of Counter-Fraud Team
- Handout of the Anti-Fraud & Corruption Policy and a discussion about it
- General guide to the role of a Counter-Fraud Officer
- What should be referred to the Section
- How do perpetrators get caught
- How to refer a case to the Section
- The things the Section need to know on the referral
- What to do if someone starts to admit that they are defrauding benefit
- False and forged documents plus a handout of the training program on how to spot these
- Managing expectations that referrers have when they refer a case
- Referral statistical graphs

As well as the above Verification Framework Fraud Awareness requirements, in order to fulfil the BFI recommendations it is also expected that the Counter-Fraud Manager revise the program further to include: -

- Corporate induction events
- All council staff, at least annually
- Revenues Division and Housing Department staff to be advised in quarterly reports on counter-fraud performance

Corporate induction events

This item will require a lot of further discussion as to how it is to be taken forward. It would entail some procedure for the Counter-Fraud Section to be advised of new starts to the Council so that induction Fraud Awareness events could be arranged. At this point in time discussions with the Head of Revenues need to be held to determine the way forward with this item.

All council staff, at least annually

Given the numbers of staff in the council it would not be practical to attempt to give Fraud Awareness Sessions to everyone. However, it is proposed to add the Fraud Awareness Presentation to the intranet. Again discussions need to be held to ensure authorisation for this.

Procedures are already in place to ensure that all new starts to the Revenues Division are given a Fraud Awareness Induction presentation within the first two weeks of joining Revenues.

Over the last financial year there has also been procedures in place to provide existing members of the Revenues, Housing and Education Departments with a Fraud Awareness Presentation and this has been updated to be more in-depth for 2004/2005.

Revenues Division and Housing Department staff to be advised in quarterly reports on counter-fraud performance

It is planned to copy this report to the Intranet with an all staff memorandum advising how to access the report.

COMPLAINT MONITORING

Counter-fraud work is a difficult area to account for customer satisfaction given that our remit is to establish claimants' committing benefit fraud and to ensure that the maximum sanction action appropriate is applied to that individual. However, there is a pre-requisite for Council employees to always treat the public with the same amount of respect and responsibility that they themselves would expect and any complaints that are received are scrutinised for any indication that we are falling short of the high standards expected.

On viewing the three complaints received in recent months in respect to Counter-Fraud Investigations along with discussing the matter with the individual staff members, there can be no doubt that there has been an increase in the amount of verbal abuse that officers are being subjected to when visiting the public. This may be down to the type and scope of the questions that must be asked when assessing a claim for possible fraud offences but also the timing of the visits.

In order to gain an accurate picture of the household, it is important that the claimants are visited at a time when they are likely to be in, which is in the early morning. It is also necessary not to provide prior notice of the visit, as the fraudster will either ensure they are not in the property at the time of our visit or they will take steps to hide all signs that could point to their committing a benefit offence. For instance, if it was suspected that there are undeclared residents in the property, these individuals would simply be elsewhere when the visit is taking place etc.

Complaints from individuals who are defrauding benefits are received ostensibly from a 'genuine' citizen in order to dissuade the council from pursuing the investigation. Unfortunately the actual genuine citizen will in some circumstances complain because they feel aggrieved at the fact that there is a suspicion that they are defrauding benefits. Unfortunately, there is no way round this issue as the referral that there may be a benefit fraud being perpetrated must be acted upon and the true facts established which lead to the appropriate decision on whether the claimant has committed a benefit fraud offence or not. It is therefore inevitable that there will be complaints with regard to the fraud investigations from time to time but with only three in recent months, all of which have been actioned and closed, monitoring will continue but there does not appear to be any need for any further form of action at the present time.