

Committee	Dated:
Housing Management and Almshouses Sub (Community and Children's Services) Committee	12 February 2018
Subject: Social Housing Tenancy Fraud – Anti-Fraud and Prosecution Policy	Public
Report of: Chamberlain	For Decision

Summary

The Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was endorsed by the Community & Children's Services Committee on the 10th October 2014. Following an update to the 'Raise Your Concern' form, and a number of changes to tenancy fraud investigations and practices that have occurred since the Policy had been developed, the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy has been refreshed.

A summary of the changes made has been provided in paragraph 6, and a tracked changes version of the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy, has been included at Appendix 1 to this report.

It was necessary to update this policy, prior to Member endorsement at Committee, as the platform for hosting the former 'Raise Your Concern' form is no longer available.

The refreshed Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was presented to, and endorsed by, the Audit & Risk Management Committee on the 28th November 2017.

Recommendation(s)

- Members are asked to endorse the changes to the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy.

Main Report

Background

1. The Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was endorsed by the Community & Children's Services Committee on the 10th October 2014. The key objectives of the policy are to:
 - i. Underpin the City's zero-tolerance approach to housing fraud, seeking possession orders, prosecution and restitutionary payment (unlawful profit orders, under the provisions of Prevention of Social Housing Fraud Act 2013) in all appropriate cases;
 - ii. Proactively prevent fraudulent activity;
 - iii. Raise awareness amongst staff and the public about tenancy fraud and what that means;
 - iv. Encourage staff, residents and members of the public to report suspected cases of tenancy fraud to the City of London Corporation;

- v. To deal efficiently and effectively with reports and allegations of social housing tenancy fraud; and
 - vi. Work in partnership with neighbouring Local Authorities and Registered Providers (Housing Associations) to share information, data and resources, where appropriate, and or where the law allows.
2. The policy provides a number of avenues for reporting concerns to The City of London Corporation, one of these is via the completion of a 'Raise Your Concern' form, which is submitted electronically to the Anti-Fraud & Investigation team for review.
 3. The 'Raise Your Concern' form, an avenue for the public, staff and contractors to raise concerns under the Whistleblowing Policy, the Anti-Fraud & Corruption Strategy and the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy has recently been updated. The new form has been designed to fit within the current suite of City of London forms and operates under a new platform. The new 'Raise Your Concern' form now provides those wishing to raise concerns with far more detail about the information required, links to policy documents and opportunities to add photographs etc, thereby making the referral far more valuable to The City of London Corporation.
 4. As part of the process to implement the new form, it was necessary to update the Whistleblowing Policy, the Anti-Fraud & Corruption Strategy and the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy in order that the links within the documents could direct those raising concerns to the form.

Current Position

5. As it had been three years since the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was developed, a number of changes to tenancy fraud investigations and practices had occurred, along with the need to update the links to the 'Raise Your Concern' form, it was considered a good opportunity to refresh the policy.
6. A summary of the changes to the policy can be found below;
 - i. 2.2: Background – updated.
 - ii. 2.4: Value of tenancy fraud to the UK – updated.
 - iii. 4.2: What is tenancy fraud – clarifying sub-letting fraud covers both long term and short-term sub-letting.
 - iv. 6.1: What is the City of London doing to combat tenancy fraud – clarifying checks with external organisations as part of the application process.
 - v. 6.1: What is the City of London doing to combat tenancy fraud – inclusion of a statement about working with neighbouring Local Authorities.
 - vi. 7.1: Legislation – addition of reference to the Forgery and Counterfeiting Act 1981.
 - vii. 9: Raising a concern - updated section.
 - viii. 10: Governance – updated to reflect six monthly anti-fraud & investigation reports to Committee.

7. It was necessary to update the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy, prior to Member endorsement at Committee, as the platform for hosting the former ‘Raise Your Concern’ form is no longer available. A tracked changes version of the Policy document has been included at Appendix 1 to this report.
8. The refreshed Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was presented to, and endorsed by, the Audit & Risk Management Committee on the 28th November 2017.

Conclusion

9. The Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy was endorsed by the Community & Children's Services Committee on the 10th October 2014. Following an update to the ‘Raise Your Concern’ form, and a number of changes to tenancy fraud investigations and practices that have occurred since the Policy had been developed, the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution has been refreshed.

Appendices:

Appendix 1: Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy (tracked changes version).

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