



Report for: INFORMATION
Item Number: 9

Contains Confidential or Exempt Information	No
Title	Head of Internal Audit 2017/8 Quarter 2 Internal Audit & Investigation Update Report
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Portfolio	Cllr Yvonne Johnson - Finance, Performance and Customer Services
For Consideration By	Audit Committee
Date to be Considered	29 November 2017
Implementation Date if Not Called In	N/A
Affected Wards	All
Keywords/Index	Internal audit and investigations

Purpose of Report:
The attached report provides Audit Committee with an update on the work of Internal Audit & Investigations for Quarter 2, 1 July 2017 – 30 September 2017.

1. Recommendation

1.1 It is recommended that the Audit Committee note the performance of the Internal Audit & Investigation team and key issues arising during the period 1 July 2017 – 30 September 2017.

2. Reason for Decision and Options Considered

2.2 This is a programmed, periodic report outlining the progress of internal audit and investigations functions, therefore, no decision is required on those section.

3. Key Implications

3.1 Internal audit is an assurance function that provides an independent and objective opinion to Council on the control environment comprising risk management, control and governance by evaluating its effectiveness in achieving corporate objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper, economic, efficient and effective use of resources. While assurance will also be sought from third parties, the assurance gained from the programme of work set out in the 2017/18 Plan will form the main input for the development of the 2017/18 opinion to Council.

4. Internal Audit Performance as at 30 September 2017

4.1 This report provides a progress update on the work of internal audit to 30 September 2017.

4.2 The 2017/18 Plan was approved by the Audit Committee in March 2017. The plan presented was indicative and can be subject to revision during the year to take account of changing priorities and emerging risks, which is aligned with good internal audit practice. The Audit Board monitors progress against the plan and the Executive Director Corporate Resources (Section 151 Officer) and the Director of Finance (Deputy Section 151 Officer) meets with the Head of Audit & Investigations and the Strategic Internal Audit Partner to discuss progress and emerging findings. A summary of the position of the planned audits and current status is set out in the table below:

	Audit Title	Scope	Audit Status	Final Report to Audit Committee
1	Workforce planning	Specialist review focusing on the resourcing implications of significant organisational change. Key risks to be addressed: <ul style="list-style-type: none"> - Inappropriate succession planning arrangements; - Operational capacity not matching business need; and - Retention and recruitment to specialist roles 	Following conversations with PWC and management about the scope of this work. The timing of this work is likely to be deferred to 2018/19 to optimise value..	

	Audit Title	Scope	Audit Status	Final Report to Audit Committee
2	Review of Related Parties	Reviews of a selection of arms-length organisations based on a risk assessment exercise, to provide assurance on governance, financial management and performance monitoring	Draft report issued.	
3	Temporary workers/contractors	Processing, recording and monitoring of contractors; would include implementation of IR35	Scoping meeting held and terms of reference drafted. Delivery planned for Q4.	
4	Continuous auditing and monitoring Phase 1 (Key financial systems)	Audit of key controls for six key systems: Accounts Payable, Accounts Receivable, NNDR, Council tax, Payroll and General Ledger	Fieldwork in progress.	
5	Continuous auditing and monitoring Phase 2 (Key financial systems)		Terms of reference being drafted. To be delivered in Q4.	
6	Data Protection	Readiness for 2018 legislation. Will be conducted across shared service	Draft report issued	
7	No recourse to public funds	Review of assessment and referral process, and budget monitoring processes.	Draft report issued	
8	Schools themed audits – Payroll and safe recruitment	Review of payroll and safe recruitment arrangements in 5 schools maintained by the Council	The schools programme has been reviewed and the themed audits replaced with audits at individual schools. 3/5 audits are currently at draft report stage.	
9	Schools themed audits – Procurement	Review of procurement arrangements in 5 schools maintained by the Council		
10	Schools themed audits – Financial governance	Review of financial governance arrangements in 5 schools maintained by the Council		

	Audit Title	Scope	Audit Status	Final Report to Audit Committee
11	Safeguarding Adults Deprivation of liberty	Controls and processes relating to Deprivation of Liberty safeguards and the Council's statutory responsibility as a supervisory body	Terms of reference agreed. To be delivered in Q4.	
12	Direct payments	Review of both children and adults Direct Payments. To consider application, assessments and monitoring processes..	Terms of reference agreed. Fieldwork to be performed in November (Q3).	
13	SEN Transport	Controls in place for managing and allocating resources and demand (Including transport)	Report issued in draft.	
14	Highways network assets (phase 2)	Extended follow up to the 16/17 highways network assets audit. To focus on systems for maintaining the records required to evidence any changes for valuation of highways network assets (the 16/17 audit focused on the systems developed by the Council to revalue Highways Network Assets in advance of the CIPFA change to ensure that the balance is complete, accurate and valid. Phase 2 to focus on 2016/17 work/updates and systems and controls to be used going forward.	Removed from the plan. CIPFA announced in March 2017 that they are no longer planning to introduce the Highways Network Assets code, so will not be adopting the changes to the accounting policy for Highways.	
15	Viridor Recycling contract	Review of contract for recycling services.	Finalised (Reasonable assurance)	Q1
16	Licensing	To focus on the new property licensing scheme (Homes of Multiple Occupancy)	Not started – scheduled for Q4.	
17	Cyclical planned maintenance	Review of planned maintenance programme - Housing stock only.	Draft report issued.	
18	Electrical safety	Compliance with	Fieldwork being	

	Audit Title	Scope	Audit Status	Final Report to Audit Committee
		legislation review - Housing stock only.	completed.	
19	Town Hall redevelopment	Governance review of the Town Hall redevelopment project.	Not started. Planning has been put back due to the status of the project, as the contract with the supplier has not yet been signed. Possible deferral to 18/19.	
20	IT Risk diagnostic	Use of IT Risk Diagnostic to identify risk areas	Audit moved into Q3 due to ongoing changes in IT structure and transfer of the functions from Serco. Scoping to take place in Q3.	
21	IT Cyber	Looking at controls to help mitigate and respond cyber .	Not started.	
22	IT Application – Framework i	Looking at application controls, e.g access; authorisations; reporting and processing. Framework i – application review.	Not started	
23	IT Application iDoc	Looking at application controls (as above)	No started	
24	Treasury Management	Review of treasury management processes for the investment portfolio and pension fund.	Report issued in draft.	
25	Trading Standards	To consider the processes in operation around visits and inspections undertaken by the service.	Scoping meetings held, terms of reference being drafted.	
26	School	Individual school audit.	Not started	
27	School	Individual school audit	Not started	

4.3 Committee asked for an update on bank reconciliations. Bank reconciliations are being completed on a monthly basis. Since April the in-year figure have been successfully reconciled. As members will recall, a (non-material balance) remained at year end for 2016/17. The banking team have now reviewed further and are now confident of resolving the full position by the end of November.

- 4.4 The table below provides a summary of progress in terms of the number of reports at draft or final stage and those in progress:

Audit Status	Number of reviews	Percentage Completion
Finalised	1	4
Draft report issued	8	35
Fieldwork in progress	2	9
Terms of reference agreed, fieldwork scheduled	2	9
Scoping meeting held, terms of reference in draft	3	11
Not started	7	30
Total	23	100
Original total	21	
Removed/on hold	3	
Additions	5	
Total	23	

- 4.5 The programme of themed audits for schools has been replaced with individual school audits. A programme of five audits has been set up. To date three (60%) have been completed to draft figures are included in the table above.

- 4.6 Key performance indicators (KPIs) have been established to measure the delivery of the audit service across the shared service. These are how we measure our performance to ensure that all audits on the plan for each Council are delivered by the end of the financial year. The shared service KPIs for delivery against the audit plan for each quarter are (based on draft reports issued):

Quarter 1 – 15% of 17/18 audits delivered (draft report issued)
 Quarter 2 – 35% of 17/18 audits delivered (draft report issued)
 Quarter 3 – 65% of 17/18 audits delivered (draft report issued)
 Quarter 4 – 100% of 17/18 audits delivered (draft report issued)

As at 31st October 2017 (end of Q2), a total of 39% of reports have been issued in draft or as final.

5. Follow Up of Recommendations

- 5.1 Follow-up of high recommendations has been completed. The results are summarised as:

Main council audits

Number of Recommendations	11
Fully implemented	3
Partially implemented	8

Satisfactory progress has been made on the 8 recommendations. These will be monitored through to completion. If significant delays occur this will be reported to committee.

Schools Audit

Number of Recommendations	5
Implemented	5

6. Counter Fraud and Investigations Performance & Developments

6.1 The Shared Service is responsible for the investigation of all types of suspected fraud within the Council, including but not limited to:

- Corporate fraud matters in relation to offences committed by employees;
- Procurement fraud by employees, contractors or other third parties;
- Fraud within schools;
- Housing related fraud; and
- Council Tax Reduction fraud.

7. Pro-active Anti-Fraud Work

7.1 The Audit and Investigation team will be participating in International Fraud Awareness Week, November 12-18. This week is set aside to raise awareness about the impact of fraud on the community.

7.2 The team will aim to raise awareness of fraud through:

- A fraud awareness roadshow located in Café Rendezvous for staff;
- a news story featured in 'inside ealing';
- the Councils social media platform Yammer to discuss fraud awareness with staff;
- a tenancy drive to visit tenants with a view to preventing and detecting tenancy fraud.
- A relaunch of the declarations of interest process.

7.3 Increasing employee and residents awareness of fraud and educating employees about fraud prevention, detection, and reporting, is critical for reducing the incidence of fraud against Ealing Council.

7.5 The pro-active plan can be found in Appendix A, the plan is fluid in order to ensure that we manage new fraud risks in an ever changing landscape.

8. Enhanced Vetting (EV)

8.1 Ealing Council has a risk assessed process of Enhanced Vetting for new recruits. This work is undertaken by the Investigation's team into both permanent and temporary posts and involves stringent checks to verify the validity of a candidate and their employment application.

8.2 Reasons for failure to progress into a post have included Benefit and Council Tax fraud, Housing fraud, false employment history, false references and false qualifications.

8.3 The outcomes of the vetting work for this period is that 13 cases either failed or prevented representing nearly 4% of all cases reviewed. A further 4 cases resulted in referrals to other organisations. The full details of the work of the vetting service is set out in the table below.

Table summarising work on Enhanced Vetting, 1 April 2017 and 30 September 2017.

Case status	Cross Council		
	Temp	Perm	Total
Pass	74	258	332
Fail	3	2	5
Withdrawn	1	7	8
Assignment Ended*	2	-	2
Total	80	267	347
Additional Outcomes			
3 rd Party Referral*	0	4	4

*Third Party Fraud Referral – represents a suspected fraud that has been identified as result of enquiries, for example, a benefit fraud by another member of a candidate's household. These referrals are not necessarily attributable directly to the candidate, but have instigated a separate fraud investigation, for example, the actions of a partner or member of immediate family of the person being vetted.

*Assignment ended specifically means that whilst enhanced vetting had commenced, the individual assignment had ended before the enhanced vetting activity could be completed. It should be noted that there will

always be an element of this particularly in services where there is a high level of short-term placements e.g. Care Workers.

8.4 Details can be found below of two cases where the candidates failed to meet the standards required by vetting:

Candidate A was the successful applicant for a permanent post dealing with the most vulnerable in the borough. The candidate had fabricated their work history to conceal unexplained gaps in his history along with dismissal from their last role.

Candidate B was employed in a temporary role. The employee had written their own reference in a disguised identity, which thoroughly recommended himself as suitable for the post.

9. National Fraud Initiative (NFI) 2016/17

9.1 The current exercise uses data submitted in October 2016. The Council received 3,297 recommended matches in February 2017. The table below details the progress made on the key reports. The key reports are the reports used by the NFI team to initially assess the Council's progress and are the reports deemed to be the most important based on previous exercise experience.

9.2 To date we have identified £29,500 in fraud and error, cancelled 9 blue badges, recovered one property and removed one person from the waiting list.

Table showing NFI key report progress

NFI Report	Recommended Matches	Initial Evaluation Commenced	Investigation Initiated	Matches Complete / Closed or Referred to DWP	Matches to Action
Housing Benefit*	148	-	-	148	-
Payroll	8	-	-	7	1
Pension	67	-	-	67	-
Housing Tenancy	5	-	-	5	-

Right to Buy	73	-	-	73	-
Resident Parking Permits	51	23	-	16	12
Blue Badge Parking Permits*	515	91		12	412
Private Residential Care Homes	13	-	-	13	-
Duplicate records creditor	597	3	-	152	442
Personal Budgets to DWP Deceased	1	-	-	1	-

*Housing Benefit recommended matches have been reviewed by Audit & Investigation and referred to the DWP Fraud and Error Service for action.

*Blue badges to deceased records, new report.

10. Investigation team performance to 30 September 2017

10.1 The table below details the performance of the team against the targets that have previously been set:

Table showing A&I Performance Indicators, 2017/18 to September

	2016/17 outturn	2017/18 target	2017/18 profile	2017/18 actual
Intelligence				
Number of new cases started	582	550	275	246
Number of cases passed for investigation	239	375	187	99
Average time from receipt of referral to 'Accepted' and forwarded for investigation	13 days	16 days	N/a	11 days
Completed pro-active operations	New target	6	3	0
Investigation				
Number of completed investigations	247	250	125	117
Number of completed investigations (not referred on to another organisation or NFA)	New target	162	81	82
Number of cases of proven (balance of probabilities) economic crime	48	68	32	24

Number of sanctions applied (includes: Prosecution; Police caution; Disciplinary action; Tenancy application refused; RTB application rejected; Council property recovered; Council Tax Reduction Scheme penalty; Blue Badge warning)	38	68	32	17
Number of council properties recovered (included above)	5	20	10	8
Number of Proceeds of Crime Act cases closed	New target	14	7	2
Court ordered confiscation or compensation as the result of a Proceeds of Crime Act financial investigation	£148,287	£100,000	£50,000	£45,000
Receipt from Court ordered confiscation or compensation as the result of a Proceeds of Crime Act financial investigation	New target	£50,000	£25,000	£0

10.2 The number of cases closed following an investigation up to 30 September 2017 was 82. Of these the number where fraud was proved on the balance of probabilities was 24. The actual fraudulent loss incurred by the Council arising from those cases totals £49,654.

10.3 In addition to the actual loss, notional savings of £248,900 have been identified, as detailed below:

Council Tenancies (Notional Savings £144,000)

10.4 In their Protecting the Public Purse 2012 publication the Audit Commission identified an average annual notional cost of £18,000 to house a family or individual in temporary accommodation. This average notional cost has been used to estimate the nominal cost to the public purse of housing a tenancy fraudster.

10.5 The 8 council tenancies recovered following investigation would therefore release accommodation for those with a genuine need and providing a notional saving of £144,000.

Right to Buy refused (Notional Savings £104,900)

10.6 The prevention of a right to buy, represents a notional savings of the discount that would have been applied (£104,900). This also protects the assets for those with a genuine need.

Targets

10.7 As mentioned at the previous Committee, there is a need to review the targets. Linking to the fraud strategy and as reflecting in the proactive plan, priorities are

to the proactive work, with the aim of preventing fraud before it happens. It was necessary to restructure the service to build up the proactive work, but the programme is up and running, with a number of events to coincide with fraud week.

10.8 Areas such as tenancy have been reprioritised. Whilst the service shows to be behind the target of 10, it is important to consider that for the year to date the Council has achieved 8 recoveries already ahead of the annual total of 5 in 2016/17.

10.9 Other targets are largely in line with previous years figures on a pro-rata basis. This further demonstrates a need to review targets.

11. Financial

11.1 All investigations activity covered in this report is being delivered within the Audit & Investigations budget.

12. Legal

12.1 Counter Fraud work is carried out in compliance with criminal and civil law and criminal investigation procedures relevant to investigation work including: the Police and Criminal Evidence Act (PACE) 1984, the Criminal Procedure and Investigations Act (CPIA) 1996, the Human Rights Act 1998, the Regulation of Investigatory Powers Act (RIPA) 2000, the Anti-Terrorism Crime and Security Act 2001, the Public Interest Disclosure Act 1998 and relevant Employment Law, Fraud Act 2006, Proceeds of Crime Act 2002.

13. Value for Money

13.1 Value for money reviews have been identified within the audit plan.

14. Sustainability Impact Appraisal

14.1 Not applicable.

15. Risk Management

15.1 The Council is responsible for ensuring that there is a sound system of internal control which facilitates the effective exercise of its functions and which includes arrangements for the management of risk.

16. Community Safety

16.1 Not applicable.

17. Links to Strategic Objectives

17.1 The issues outlined in this report have a particular focus on the Council's organisational improvement objective 'Becoming a high performing organisation, focused on the needs of its communities'.

18. Equalities and Community Cohesion

18.1 Not Applicable.

19. Staffing/Workforce and Accommodation implications

19.1 Applications have closed for the permanent Head of Audit and Investigations post. The shortlisting process is underway and interviews will be conducted in December.

20. Property and Assets

20.1 Not applicable.

21. Any other implications

21.1 None.

22. Timetable for Implementation

22.1 Not applicable.

23. Appendices

23.1 Appendix A – Proactive Plan.

24. Background Information

24.1 Details of internal audit reports are available to Members upon request from Mike Pinder, Head of Internal Audit & Investigations, pinderm@ealing.gov.uk.

Consultation

Name of Consultee	Department	Date sent to consultee	Date response received from consultee	Comments appear in report para:
Ian O'Donnell	Executive Director of	07/11/17	08/11/17	Throughout

Ross Brown	Corporate Resources Director of Finance		Throughout
Cllr Yvonne Johnson	Portfolio Holder – Finance, Performance & Customer Services	N/a	

Report History

Decision type:	Urgency item?		
For information	No		
Authorised by Cabinet member:	Date report drafted:	Report deadline:	Date report sent:
Report no:	Report author and contact for queries: Mike Pinder, Head of Audit & Investigations, ext 5792		

Ealing and Hounslow Audit & Investigation Shared Service

Anti-fraud proactive plan 2017-18

Introduction

1. The Anti-fraud proactive plan is developed in line with the key fraud risks set out in the fraud strategy (attached as appendix A); the single proactive plan is designed to expand the proactive work across the shared service. It will provide the mechanisms for:
 - conducting initiatives to prevent fraud
 - encourage all employees and other stakeholders to fight fraud and other acts of dishonesty
 - detecting fraud

The proactive plan will remain fluid to reflect changes from e.g. reactive work, new fraud risks.

Summary of work plan

2. The plan is set up in to two key areas.
 - Soft measures are related to strategy and policy, to help set the tone of the organisational culture in relation to prevention and detection of fraud.
 - Hard measures which are designed to detect and develop prevention measures for services moving forward.

Soft Measures

Project Description	Fraud Risk Ref (see appendix Ai)	Tasks
Anti-Fraud e-learning	All	Review current e-learning training and refresh training content to include bribery and corruption.
CIPFA fraud checklist	All	Undertake a realistic self-assessment of the major fraud risks within the shared service.
Bespoke Anti-fraud training	All, but programmes for 6, 8, 10, 11.	To develop and run bespoke anti-fraud training including: <ul style="list-style-type: none"> - Grants awareness for staff administrating and monitoring grants.
Policies and procedures	All	To review and update all policies linked to anti-fraud and corruption across the shared service.
Transparency	All	To review transparency requirements and report in line with requirements
Procurement	2, 8	To obtain the cartels risk assessment form from the Competition & Markets Authority, and conduct a review into its effectiveness within the local authority arena.
Advice	All	To respond to requests for advice on how to embed anti-fraud messages and prevention into council processes.
Fraud material refresh	All	To review all content associated with fraud and audit across the service, to ensure it is up to date and current.
Publicity campaign	10, All	Produce and distribute fraud cards to employees. Develop fraud banners to advertise service. Publicise fraud news on the intranet, staff and residents newspapers and on social media. Campaign to be arranged around Fraud Awareness Week, 12-18 November 2017.

Hard Measures

Project Description		Fraud Risk Ref (see appendix Ai)	Tasks
National Initiative	Fraud	1,2,3,4,5,7,8,10	Key contact for the NFI programme. Co-ordinate submission of data. Complete work relating to anti-fraud.
ID (Ealing)	Scanners	10,11,1,22	To explore the re-introduction of the use of ID scanners.
iLatch – tenancy checker		1,13	To explore the use of iLatch functionality in preventing housing fraud.
Data Matching		1,2,3,4,9	To undertake any suitable data matches internally to prevent fraud. Housing tenancy data match.
London Counter Fraud Hub (Ealing)		1,4,12,13	To be involved within the pilot stage of the LCFH and to represent the fraud team and all development meetings.
Cyber Security – phishing exercise		23	Raise the profile of phishing and ransomware by carrying out a proactive cyber security test on end users within the Council.
Estate action days		1,4,13,22,11	To conduct targeted tenancy checks across the shared service.
Conflict of Interest (Ealing – roll out to Hounslow)		10	Ensure the service has a robust process in place for recording conflicts of interests. Redesign and relaunch the declaration of interest process.

Vetting (Ealing)	10,11,4,1	Undertake enhanced pre-employment checks on new recruits.
Vetting	1,3,4,9,10	To review key services and access controls. To consider: <ul style="list-style-type: none"> - Waiting list and allocations - Right to buy - Council Tax - Personal Budgets - No Recourse to public funds To identify scope for enhanced vetting; id scanners to help prevent fraud in these areas.
Schools	8	Including potential fraud risks in the schools internal audit plan to help prevent and detect risk.

Appendix Ai – Anti-Fraud Strategy- Fraud Risks

The key fraud risks set out below were presented to the audit committees for Ealing and Hounslow in February 2017. These were informed by the Fighting Fraud and Corruption Locally strategy 2016-2019 (more details in appendix A ii). Numbers are allocated below and cross reference to the proactive plan.

Known Fraud Risks		Emerging/Increasing Fraud Risks	
1.	Tenancy	12.	Business Rates
2.	Procurement	13.	Right to buy
3.	Payroll	14.	Money Laundering
4.	Council Tax	15.	Insurance Fraud
5.	Blue Badge	16.	Disabled Facility Grants
6.	Grants	17.	Concessionary Travel Schemes
7.	Pensions	18.	No Recourse to Public Funds
8.	Schools	19.	New Responsibilities
9.	Personal Budgets	20.	Commissioning of Services
10.	Internal Fraud	21.	Local Enterprise Partnerships
11.	Identity Fraud	22.	Immigration
		23.	Cyber dependent crime/Cyber enable fraud

Appendix Aii – Fraud Risks and descriptions from the Fighting Fraud Locally Strategy 2016-19.

Known Fraud Risks Remaining Significant	Emerging / Increasing Fraud Risks
<p>Tenancy – Fraudulent applications for housing or successions of tenancy, and subletting of the property.</p> <p>Procurement – Tendering issues, split contracts, double invoicing.</p> <p>Payroll – False employees, overtime claims, expenses.</p> <p>Council tax – Discounts and exemptions, council tax support.</p> <p>Blue Badge – Use of counterfeit/altered badges, use when disabled person is not in the vehicle, use of a deceased person's Blue Badge, badges issued to institutions being misused by employees.</p> <p>Grants – Work not carried out, funds diverted, ineligibility not declared.</p> <p>Pensions – Deceased pensioner, overpayments, entitlement overstated.</p> <p>Schools – Procurement fraud, payroll fraud, internal fraud.</p> <p>Personal budgets – Overstatement of needs through false declaration, multiple claims across authorities, third party abuse, posthumous continuation of claim.</p> <p>Internal fraud – Diverting council monies to a personal account; accepting bribes; stealing cash; misallocating social housing for personal gain; working elsewhere while claiming to be off sick; false overtime claims; selling council property for personal gain; wrongfully claiming benefit while working.</p> <p>Identity fraud – False identity / fictitious persons applying for services / payments.</p>	<p>Business rates – Fraudulent applications for exemptions and reliefs, unlisted properties.</p> <p>Right to buy – Fraudulent applications under the right to buy/acquire.</p> <p>Money laundering – Exposure to suspect transactions.</p> <p>Insurance Fraud – False claims including slips and trips.</p> <p>Disabled Facility Grants – Fraudulent applications for adaptations to homes aimed at the disabled.</p> <p>Concessionary travel schemes – Use of concession by ineligible person, including Freedom Passes.</p> <p>No recourse to public funds – Fraudulent claim of eligibility.</p> <p>New Responsibilities – Areas that have transferred to local authority responsibility e.g. Public Health grants, contracts.</p> <p>Commissioning of services – Including joint commissioning, third sector partnerships – conflicts of interest, collusion.</p> <p>Local Enterprise Partnerships – Voluntary partnerships between local authorities and businesses. Procurement fraud, grant fraud.</p> <p>Immigration – Including sham marriages. False entitlement to services and payments.</p> <p>Cyber dependent crime and cyber enabled fraud – Enables a range of fraud types resulting in diversion of funds, creation of false applications for services and payments.</p>

Fighting Fraud Locally 2016-2019 Image.