

Appendix 3 – Corporate Anti-Fraud Team 2016-17 Year End Revised Plan Report

| | Fraud work stream | Proposed counter fraud activity | 2016-17 Year End Outcomes |
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| | Objective: Acknowledge fraud and corruption risks, reaffirm the responsibility of the leadership team in managing these risks and assess the risk of fraud and corruption across all parts of the organisation. | | |
| 1 | Corporate fraud risk assessment | Identify and assess Harrow's fraud risk exposure affecting the principle activities in order to fully understand changing patterns in fraud and corruption threats and the potential harmful consequences to the authority and our customers | <p>Objective partially achieved</p> <p>The Head of Internal Audit, Corporate Anti Fraud Manager and Risk Manager met with the Directorate Department Management Teams (DMTs) early in the financial year and held discussions around fraud risks affecting their particular service areas. This will continue for 2017/18 and beyond.</p> <p>Capturing the required detail of relevant fraud risk information has been challenging mainly due to capacity issues and conflicting priorities faced by the team, predominantly relating to the quantity and complexity of fraud referrals received. The information captured as part of these discussions was combined with other fraud risk information from national reports, the sharing of fraud information through partnerships in counter fraud networks and known fraud established and this fed into the fraud plan for the year.</p> <p>After the initial discussions in DMT's it was decided that further consultation was required across Directorates and therefore fraud risk workshops will be taking place in 2017/18 to enable detailed information across the organisation surrounding significant fraud risks to be identified, risk rated (inherent and residual), known controls documented and further work identified to improve the fraud risk resilience of the organisation.</p> <p>This risk assessment work will inform the establishment of a fraud risk register where service areas will take responsibility for managing and mitigating fraud risks impacting their work with guidance and support from Internal Audit and Corporate Anti-Fraud.</p> |
| 2 | Corporate Anti-Fraud & Corruption Strategy | Development of a counter fraud and corruption strategy that links to the Harrow's corporate priorities, the overall goal of improving resilience to fraud and corruption and fully reflects | <p>Objective achieved</p> <p>The Council's Corporate Anti Fraud & Corruption Strategy was reviewed and went before full Council on 23rd February 2017 and was for approved adoption into the Council's Constitution. The strategy will be reviewed</p> |

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| | | the fraud risks faced by the authority | annually to ensure that the organisation is responsive to emerging fraud risks and the team can support the directorates in managing fraud risk effectively. |
| Objective: Prevent, detect and deter fraud and corruption impacting the organisation by raising awareness of fraud and corruption | | | |
| 3 | National Fraud Initiative co-ordination role | <p>Plan, prepare and co-ordinate the 2016/17 National Fraud Initiative (NFI) exercise including:-</p> <ul style="list-style-type: none"> • Review of all fair processing and collection notices for all data sets and submit notification to Cabinet Office by 30/06/16 • Review of all data sets specifications with service areas by 31/08/16 • Extract data from key systems by 03/10/16 • Allocate matches to service areas on 29/01/17 | <p>Objective achieved</p> <p>The NFI project met the deadlines with only a handful of minor data specification issues with some services. Work commenced in May 2016 by consulting with the service areas ensuring that all had satisfactory fair processing notices in place and resulted in the following data sets being uploaded to the Cabinet Office secure site in December 2016.</p> <ul style="list-style-type: none"> • Blue Badges and Concessionary Travel Passes • Council Tax – Single Persons Discount and Council Tax Reduction • Creditor data – Standing and Historical • Electoral Roll • Housing – Current tenants and waiting list • Insurance • Alcohol Licensing • Residents Parking Permits • Payroll • Pensions • Person Budgets • Private Supported Care Homes • Right to Buy <p>CAFT takes on a co-ordinating role ensuring that services understand their matches and how they can approach processing. Data outputs from the project were released to service areas in February 2017 and the CAFT has worked closely with them to ensure that any exceptions are picked up in a timely manner.</p> <p>As at 30/04/17 processing work on 21 of the 23 (91%) key reports had commenced and in the two reports were work had not commenced, there were no recommended matches (high risk) that required work.</p> <p>In terms of outputs, as at 30/04/17 there was a total of £10,649.48 raised in overpayments broken into the following:-</p> |

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| | | | <p>Housing Benefit £7004.09 (undeclared student status) Pensions £3575.59 (undeclared pension death and forward savings) Payroll £70</p> <p>Further NFI progress will be reported in the 2017-18 mid-year report</p> |
| 4 | Corporate fraud awareness | <p>Raise awareness of fraud and corruption both within the authority and in the community through running an awareness campaign and the publication of fraud successes in local and national media, including the use of all forms of social media</p> | <p>Objective achieved</p> <p>Fraud awareness sessions A total of four fraud awareness for identifying fraud in housing have been delivered in conjunction with a refresher session for using credit bureau data to support housing audit work.</p> <p>Two sessions on identity fraud awareness training have been delivered to the No Recourse to Public Funds Team (NRPF) and a roll out programme is being planned for Social Workers/Customer facing roles in 2017.</p> <p>An e-learning fraud awareness package has been developed with a supplier and the fine tuning is being undertaken with them so that it is bespoke for Harrow employees. Once this is complete there is an intention for all new employees to undertake the training and all existing employees to be trained by March 2019.</p> <p>Publicity The Team featured in a Housing fraud article called <i>Spot It, Stop It, Save It'</i> in 'Homing In' in July 2016 and they also attended the Housing Fair on 9th July 2016 where they promoted the reporting of fraud affecting council tenancies.</p> <p>The Team also featured on two episodes of Channel 5's 'Under Cover: Nailing the Fraudsters' which broadcast in September 2016. The episodes featuring the team followed a planned blue badge enforcement operation in the town centre and partnership work undertaken with Housing Resident Services on a tenancy fraud case where the tenant had moved out without informing the Council.</p> <p>A Housing Fraud campaign commenced in January 2017 with the following actions:-</p> <ul style="list-style-type: none"> • Fraud flyers encouraging people to report tenancy fraud and offering a £500 incentive distributed to all Harrow Council tenants and leaseholders inside the Homing In magazine - January 2017 (see advert) |

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| | | | <ul style="list-style-type: none"> • 2 week advertising campaign on 23 JC Decaux advertising boards throughout the borough encouraging the public to report tenancy and offering a £500 incentive – January 2017 • Fraud flyers distributed to all leaseholders with annual service charge/ground rent statements – Feb 2017 • Fraud flyers distributed to all tenants with rent statements - March 2017 <p>The team has reviewed its reporting style and structure and is now reporting investigation work in a consistent template both internally and to management more frequently where a) there is a recommendation as a result of the investigation for management to consider and/or to improve fraud risk controls and b) to inform management of any criminal sanction to be imposed on an individual.</p> <p>This improved reporting style is more in keeping with Internal Audit reports and illustrates a unity and joined up approach from the team since coming together. The reports also raise awareness of fraud across the authority which is a key area of work both in the work plan and throughout the recently reviewed Corporate Anti Fraud & Corruption Strategy.</p> |
| 5 | Fraud liaison | Develop and maintain effective liaison with investigation teams in other boroughs and external agencies and ensure that membership continues of the London Borough of Fraud Investigators Group (LBFIG), The Local Authority Investigation Officers Group (LAIOG), the National Anti-Fraud Network (NAFN) and the European Institute for Combatting Corruption & Fraud (TEICCAF) | <p>Objective achieved</p> <p>The authority has retained its membership of the National Anti Fraud Network (NAFN) for its essential role in intelligence gathering and the London Borough of Fraud Investigators Group (LBFIG). NAFN is an essential conduit for accessing 3rd party information sources which is vital for supporting investigation work.</p> <p>Officers in the team have also attended a number of Counter Fraud Conferences during the year which is important to keep abreast of current fraud trends and emerging fraud risks.</p> <p>Established partnerships with the Border Force, HMRC, the Home Office, the Metropolitan Police and other enforcement agencies have proven beneficial to current investigation work.</p> |

Objective: Ensure the investigation of allegations of fraud and corruption are effective, criminal conduct is punished with appropriate sanctions, established losses are pursued robustly and fraud loss avoidance is measured effectively where possible

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| 6 | <p>Housing fraud</p> | <p>Assess and investigate allegations of fraud and abuse in the housing system working in partnership with Housing Resident Services, Housing Needs and Harrow's RSL's including:</p> <ul style="list-style-type: none"> • Seek to recover 10 social housing units subject to fraud & misuse • Prevent housing application fraud through targeted application validation and potential sampling of temporary accommodation/bed & breakfast • Prevent fraudulent Right to Buy (RTB) applications through targeted application validation • Prevent mutual exchange, succession and assignment fraud through targeted application validation • Prevent abuse of the housing incentivisation scheme through targeted application validation • Undertake a housing data match on Harrow's housing stock working alongside a credit reference agency • Maintain and develop membership of the London housing fraud hub and explore other datamatch opportunities • Consider running a housing fraud centric publicity campaign to raise awareness | <p>Objective achieved</p> <p>Tenancy Working in partnership with Housing Resident Services, 13 social housing tenancies have been recovered to date resulting in notional fraud savings to the authority amounting to £467,000.</p> <p>In 2016/17 the team received 62 housing tenancy referrals and at present has a caseload of 53 live tenancy investigations (including 7 housing association cases) at various stages of investigation including:-</p> <ul style="list-style-type: none"> • 3 cases currently with HB Public Law for possession action <p>Housing Applications Working in partnership with Housing Needs, 4 applications for housing have been intercepted following fraud validation checks. This has resulted in fraud loss avoidance savings of £207,000. The CAFT are fraud validating each application that is set live on the Council's waiting list. Two individuals accepted cautions for providing false information on their applications forms and their applications were rejected.</p> <p>A total of 46 housing application referrals have been received to date and 1 other application for an incentive through the Council's under occupation scheme. Of these, 19 are live cases of which 12 are actively under investigation and 7 awaiting allocation to an officer.</p> <p>RTB applications Working in partnerships with Leasehold Services, HB Public Law Services and Housing Residents Services 2 RTB applications were intercepted saving the authority £207,800.</p> <p>The team has received 26 RTB referrals in 2016/17. Currently there are 16 cases live of which 11 are under active investigation and 5 yet to be allocated to an officer.</p> <p>In November 2016, the team commenced a more robust RTB application validation process whereby anti money laundering checks are deployed on all applications at the stage when the purchaser engages with HB Public</p> |
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| | | <p>internally and the community including an amnesty</p> <ul style="list-style-type: none"> • Maximise the use of powers contained within the Prevention of Social Housing Fraud Act 2013 (PoSHFA) in terms of gathering evidence, investigation and prosecution of offenders and recovery of unlawful profit | <p>Law. The purpose of this check is to determine the source of funds being used to purchase the Council property and to rule out money laundering.</p> <p>A National Hunter pilot also commenced in Q4 whereby the National Anti-Fraud Network (NAFN) invited applications from LA's where they held financial irregularity concerns on RTB applications where they would then lodge the concern with the proposed lender, A number of very promising cases are live currently where the lender has withdrawn their offer due to the tenant providing false income details on their application.</p> <p>Housing Datamatch The team commissioned a bulk datamatch of tenancy records against credit bureau data which is included as part of the membership of the London housing hub. The matches were returned in Q2 and were as follows:-</p> <ul style="list-style-type: none"> • Total records matched 4794 • Red 48 matches (all matches cleared with information already known to the authority mainly around deceased tenants) • Amber matches 170 (all processed and no issues found) • Green matches 4576 (no issue) <p>The datamatch, whilst not identifying any fraudulent cases has provided some assurance that tenants identified in the matches whilst linked to other addresses were occupying their tenancy address. A further risk based review will be considered in the future.</p> <p>Gas Warrants CAFT accompany Housing Resident Services on all gas servicing entry warrants with a view to establishing possible leads for the tenant whereabouts and reasons for not responding to the letters requesting access to undertake this work. Repossession of 2 properties have been achieved through this work stream where the properties have been abandoned.</p> <p>Housing Fraud Hub The authority continues its membership of the hub and submits data on a monthly basis for matching in London.</p> <p>PoSHFA 2013 Powers The authority has utilised powers contained within the above act through requests to the National Anti Fraud Network (NAFN) on 16 occasions this</p> |
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| | | | <p>year. If approved by NAFN, this enables the authority to access personal financial data on the tenant held by the banks on cases where it appears they have either sublet the property or are not residing as their principle home.</p> <p>Overall fraud savings attributed to this work stream is approximately £881,800 (see case studies in Appendix)</p> |
| 7 | Internal fraud & corruption | Assess and investigate allegations of internal fraud and corruption in a timely manner | <p>Objective achieved</p> <p>In 2016/17, 4 employees (1 permanent and 3 agency employees) were dismissed as a result of fraud and corruption. This has generated savings of £144,000 (combined annual salaries for 1 year) and a further amount of £6,266.55 issued in invoices where 1 employee had written off their own penalty charge notices (£1140) and 1 employee had diverted CT payments made by members of the public to their own account (£5126.55).</p> <p>1 employee was apprehended misusing a blue badge on the Civic Centre, 1 employee was working undeclared for another Local Authority in London as a self employed contractor and claiming to be working in both authorities at the same time. Another employee was working through an agency on false documents (currently case is with the Crown Prosecution Service) and the final permanent employee was dismissed for claiming a Single Person Discount fraudulently.</p> <p>The team has received 10 referrals this year and currently has 8 live investigations.</p> <p>Of the 8 live investigations:-</p> <ul style="list-style-type: none"> • 5 cases under active investigation of which 1 is due to interviewed formally shortly • 3 cases are with the police following arrest with 2 currently with the Crown Prosecution Service awaiting charges. <p>In relation of one of the cases involving the police, this case has consumed a great deal of time and resource of the team in Q3 and Q4 as it has appeared organised in its nature and impacted multiple claims for housing benefit. The employee was suspended and subsequently arrested by police. This investigation is being undertaken in tandem with the police and it is envisaged to run well into 2017-18 and possibly beyond given its complexity.</p> <p>Overall fraud savings attributed to this work stream is approximately £150,266.55 (see case studies in Appendix)</p> |

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| 8 | No Recourse to Public Funds (NFPF) fraud | Work in partnership with the People Directorate to explore the area of <i>No Recourse to Pubic Funds</i> (NRPF) recently highlighted in Protecting the English Public Purse 2015, in undertaking targeted application validation and make recommendations to better manage fraud risks | <p>Objective achieved</p> <p>The team received 2 NRPF referrals during the year and both cases were linked to identity fraud. They are currently both live.</p> <p>These investigations are complex because the applicants have dependant children so there is a duty on behalf of the authority to support and safeguard them under Section 17 of the Children’s Act.</p> <p>Added to a live case carried over from 15/16, the cost of these three cases alone to the authority in terms of housing and subsistence funding is around £150,000 per annum. If evidence is uncovered of identity fraud then a decision will be taken on prosecution of the applicant.</p> <p>The team continue to liaise with the NRPF Team and Immigration on all cases to ensure that the gateway to services is robust and to ensure that fraud is identified and dealt with appropriately and preferably before it enters the system.</p> |
| 9 | Revenues fraud | Work in partnership with Revenues and Benefits to Investigate allegations of fraud and abuse of the Council Tax (CT), Council Tax Reduction Support (CTRS) and Non Domestic Rates (NNDR) systems, including exemptions, discounts, and reliefs and apply appropriate sanctions where fraud is proven | <p>Objective achieved</p> <p>The team has received 32 referrals of Council Tax discount fraud, CTRS fraud and NNDR fraud of which there are currently 9 live cases.</p> <p>1 case has resulted in the applicant being issued with a £1000 administrative penalty which has been paid in full in addition to the fully repaid CTRS of £3533.50.</p> <p>11 other cases were all investigated and individuals interviewed formally about their failure to notify the Council about a change in their circumstances affecting entitlement. None of these investigated resulted in any criminal sanction but overpayments were raised amounting to £55,034.45 which are now being paid back by the customers.</p> <p>Overall fraud savings attributed to this work stream is approximately £59,567.95</p> |
| 10 | Blue badge fraud | Working in partnership with Concessionary Fares and Parking Enforcement to investigate allegations of fraud and abuse of the disabled badge scheme by taking part in the Council Secure Streets Days of Action | <p>Objective achieved</p> <p>The team received 42 referrals of which 26 are currently live investigations.</p> <p>The team carried out 1 on street enforcement operation which resulted in an employee being challenged for badge misuse.</p> |

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| | | schedule on a risk basis. | <p>4 cautions have been administered to individuals caught misusing badges registered to others, 2 of which were for employees. They were both dismissed, although 1 was dismissed during 15/06 and not cautioned until 16/17.</p> <p>8 other individuals were interviewed formally about badge misuse allegations, but no further criminal sanctions were applied.</p> <p>Overall fraud savings attributed to this work stream is approximately £6,400</p> |
| 11 | Social care fraud / grants | Work in partnership with the People Directorate to explore social care fraud and abuse by ensuring that funding is spent according to care plans and make recommendations to better manage fraud risks | <p>Objective achieved</p> <p>The team received 8 referrals during the year in relation to social care fraud.</p> <p>There are 8 live investigations at present. Of the live cases, 4 are in relation to social care/direct payments and 4 are in relation to disabled facility grant applications where there are concerns that estimates provided for building works are false.</p> <p>The team obtained evidence in relation to a disabled facility (DFG) grant application that resulted in the application being rejected due to inconsistencies with the applicant's builder and cost of the works undertaken. This resulted in a savings of £26,0000.</p> <p>The other positive outcome case was in relation to a core offer grant provided to an individual to employ a carer for help with a child. The carer was never employed so the grant was paid back. Saving £410.</p> <p>Overall savings attributed to this work stream is £26,410</p> |
| 12 | Partnership working | Responding to requests for information in a timely manner from our law enforcement partners e.g Police, Other LA's etc | <p>Objective achieved</p> <p>The team responded to requests for information from law enforcement agencies when required to offer support to their investigations. There are a number of live investigations that are being undertaken jointly with both Immigration and the Metropolitan Police.</p> |
| 13 | Risk assess fraud referrals | Assess and investigate allegations of fraud and corruption on a risk basis in a timely manner | <p>Objective achieved</p> <p>The team has received 242 fraud referrals in 2016-17 and currently has 144 live investigations. There were some bedding in issues with a new fraud</p> |

case management system that was implemented in Q2, but this has now settled down.

For Q1 & Q2 there was a backlog of fraud referrals and the associated fraud referral risk assessment process as the team struggled to absorb this work which was previously undertaken by the 1 FTE post that was deleted in April 16 as part of the MTFS.

In Q3, the team simplified the risk assessment matrix for deciding whether to invest resources in an allegation or not. The result of the review meant that greater emphasis was placed on higher risk and higher value fraud and that which could potentially impact the authority in terms of financial and reputational damage. This helped clear part of the backlog.

In Q4 the team started to utilise a resource from Internal Audit for 1 day per week and this has assisted the team keep on top of incoming referrals and to deal with requests for information from other law enforcement agencies. A more permanent arrangement for supporting the team will be developed in 2017/18 that does not impact upon Internal Audit.

Fig 1

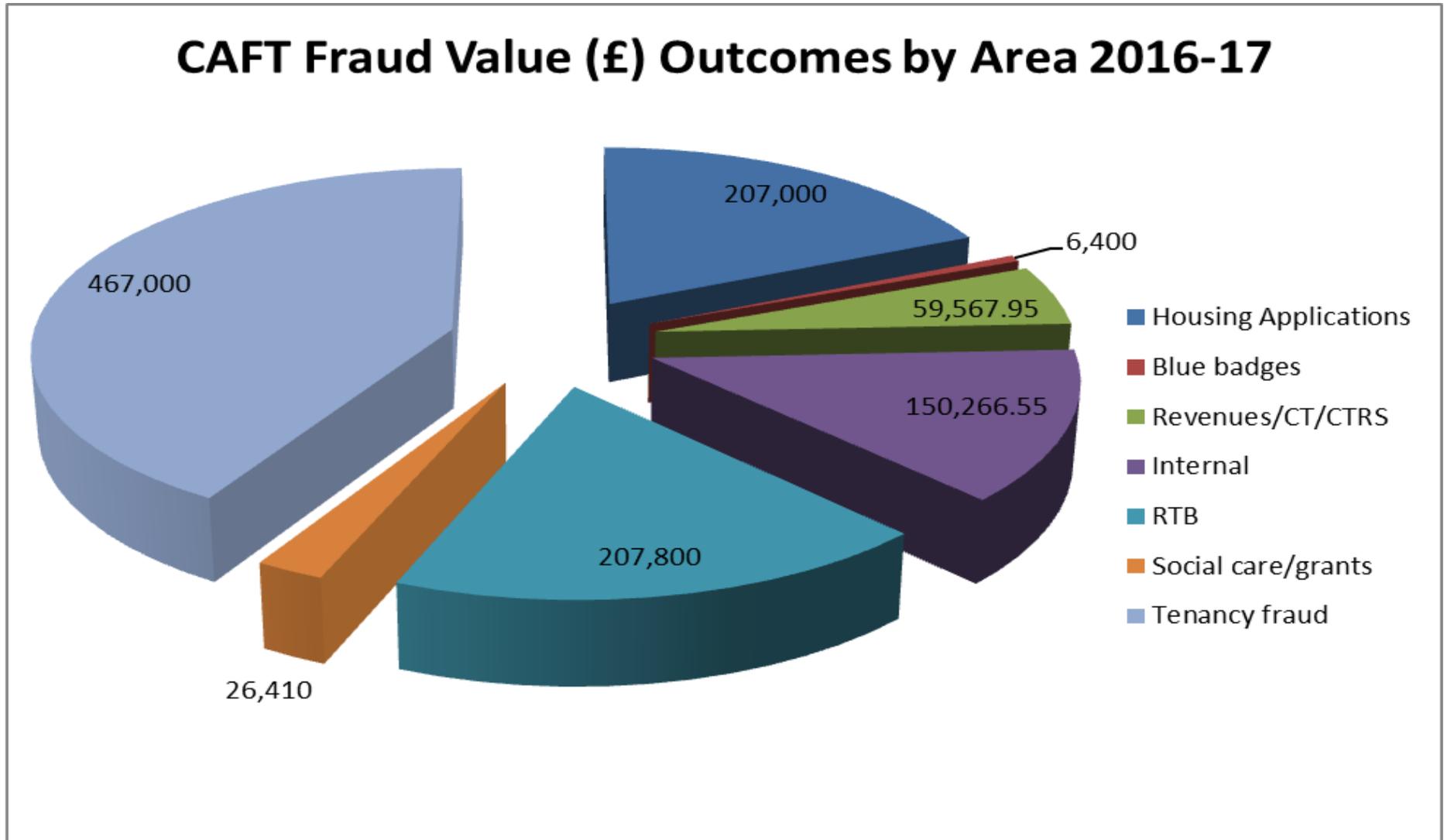
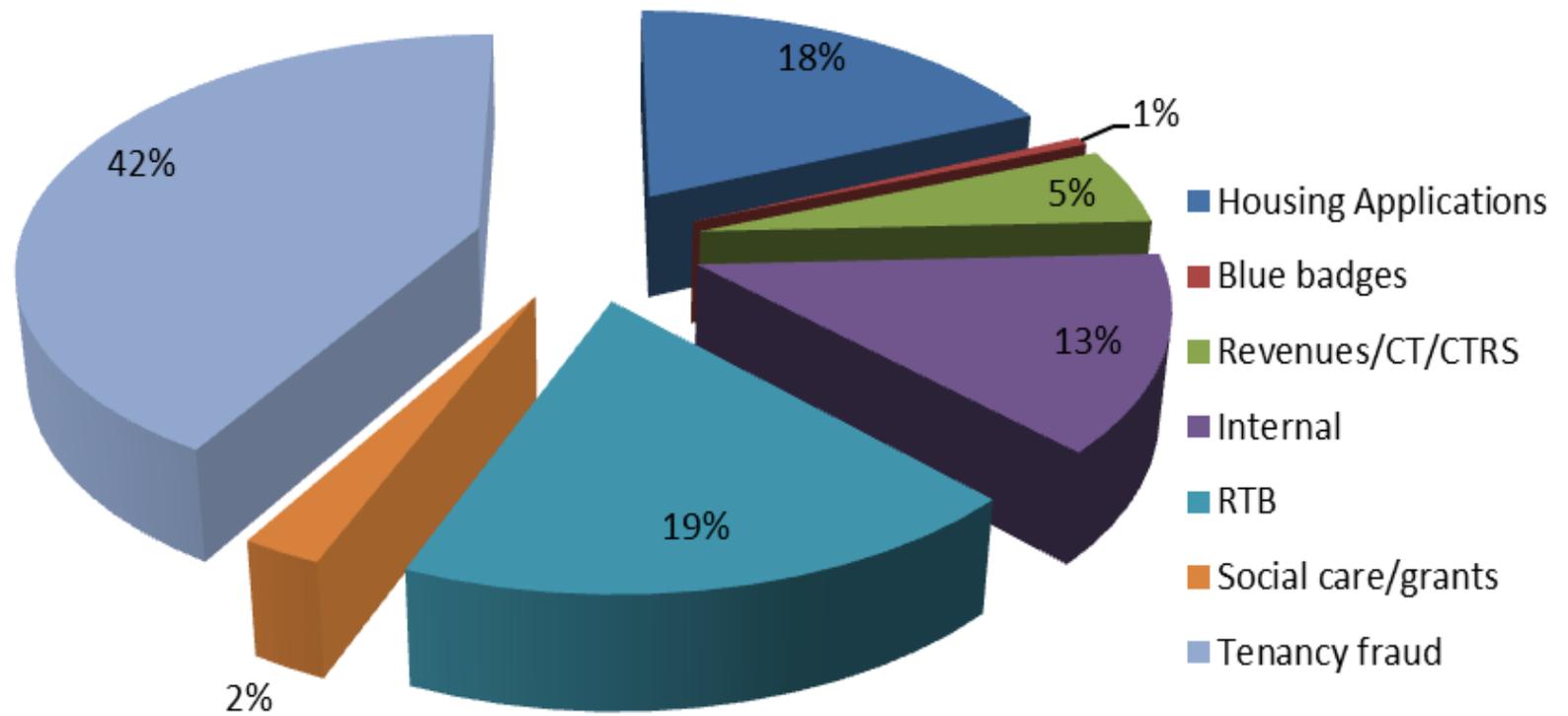


Fig 2

CAFT Fraud Value % Outcomes by Area 2016-17



Examples of investigations undertaken during 2016/17

1. Right to Buy and Housing Tenancy Fraud

A phone call alerted the authority that Tenant A and her son had not appeared to be living in the property for a number of years, but that a relative did, alongside a young couple. The housing officer quickly alerted the council's Corporate Anti-Fraud Team whose enquires uncovered that Tenant A regularly travelled to the US and a review of bank activity showed regular withdrawals from New York, USA.

Tenant A had moved into a Harrow Council two-bedroom home in October 2013 and on the surface they were a good tenant, paying rent on time and not causing any issues with neighbours. All that changed in July 2016 when they applied to buy their council home through Right to Buy (RTB), in which they failed to mention that they hadn't lived in the UK or used the property as their main home in the year prior to the application. Tenant A was interviewed under caution to answer allegations that they no longer living at the property, they initially denied the fraud but then admitted that they had become a US resident in March 2015, two years after obtaining the council home.

The RTB application was rejected savings the Council £103,900 and they were served with a Notice to Quit the property. Within a few days of receiving the notice they returned the keys. The property is now home to a Harrow family who had been living in emergency accommodation.

2. Internal fraud – payment manipulation

The matter was referred to the Corporate Anti-Fraud Team when it was established that a number of payments amounting to approximately £5,000 made by members of the public in relation to Council Tax liability were diverted to an agency employee's bank account. The officer had been charged with making contact with customers and taking payments from them to clear arrears, only that they used their own account details to accept the payments rather than that of the authority.

Immediately before the fraud became apparent, the agency employee had left the authority. Customers were alerted to the financial irregularity when they continued to receive overdue payment notifications after they had made payments.

Through enquiries made with the victims and the police, the suspect was traced to an address in another London Borough and arrested and interviewed about the allegations, but denied any wrongdoing. The case is currently with the Crown Prosecution Service for charging advice.

3. Right to Buy and Housing Tenancy Fraud

Tenancy fraud investigations were initially launched into Tenant B by the Corporate Anti-Fraud Team into a following receipt of a Right to Buy (RTB) application by the tenant in October 2015, who after background checks, was identified as being a joint homeowner elsewhere. The RTB application was withdrawn by the tenant shortly after the discovery saving the Council £103,900.

Fraud enquiries also identified that the tenant had spent lengthy periods of unnotified absence from the tenancy and the absence was linked to an overseas destination. A number of visits to the address proved unsuccessful so a written request was left for the tenant to contact officers to discuss their housing arrangements. The tenant called the Council in September 2016 from the linked overseas location and stated that they had left the country only recently to attend a family emergency. However enquiries with the Home Office confirmed that the tenant had left the country April 2016 and had no plans to return to the UK until January 2017. In total the tenant had spent around 25 months out of the country since 2013.

On the tenants return to the UK, another application for a moving out grant was submitted in February 2017 which offers tenants a sum of money in return for relinquishing their Council property. The tenant was interviewed under caution in March 2017 about their occupation of the property and refused to answer any of the questions or provide an account for the frequent travel including the recent 9 month absence. The tenant, when informed of the Council's intentions to reject the grant and recover the property through a legal process, handed in the keys into the authority in April 2017.

4. Housing application fraud

Mr & Mrs A applied to the Council for housing from an address in the borough following the sale of a property. They subsequently declared little surplus capital from the sale as they had to pay off debts. Further financial enquiries revealed that the applicants had in fact transferred a sum of £80,000 overseas from the sale and had tried to conceal it from the Council. In addition to this, in trying to validate the address they were applying from, enquiries led officers to an address in a neighbouring borough where the applicants were found residing.

The application for housing was rejected on grounds of excess capital and not residing in the borough so false information was provided which invalidated the application. Given the fact that the fraud was prevented and there was no actual loss caused, both individuals were offered cautions and they accepted. The investigation saved the authority in the region of £27,000 as they would have qualified to be housed in a 1 bed property.

5. Disabled Facility Grant fraud

Mr B applied to the authority for a disabled facility grant to adapt a property for a disabled relative. The estimate of works by a builder was approved by the Council and works carried out to building regulations. When the invoice from the builder to Mr B for the works was provided to the Council as evidence that the transaction and works had taken place, it was queried by officers processing the grant application as it appeared suspicious and the matter referred for investigation.

Following enquiries made with the builder, it was confirmed that they had not issued the invoice and it transpired that Mr B had used the estimate to produce a similar looking invoice so that the Council would release the grant. Mr B and the builder had disagreed about the work standard carried out and the builder had walked off the job before completion. The builder had not been fully paid and was owed money by Mr B.

A report was produced by the CAFT recommending that the grant application be refused on the grounds that an acceptable invoice had not been produced and this was accepted by the service. The investigation saved the authority in the region of £25,000.

6. Internal Fraud

Information was received alleging that an officer employed on a full time permanent role with Harrow was also working full time for another Local Authority via an agency. Enquiries revealed that the officer was primarily site based (both roles) and was managing to meet targets whilst being paid for in excess of 70+ hours per week. Their routine was to check into the office at Harrow in the morning picking up work, then take a train to the other authority based in central London to do the same.

The officer managed to keep in contact regularly with both offices using mobile technology and managed to undertake their tasks sufficiently well enough so as to not cause any performance concerns. Evidence of their time billed to the authority was obtained through agency timesheets where it was established they were seemingly in two places at the same time.

The officer denied doing anything wrong in interview, but then offered their resignation, which was rejected. A report was produced for management recommending suspension and disciplinary investigation for fraud. The officer was found guilty of gross misconduct following a hearing and summarily dismissed from the authority.

The true value of the fraud was difficult to establish because both organisations were arguably victims of the individual's actions, but was estimated to be in the region of £35,000 for the period where evidence showed the dual jobs.