

# APPENDIX A

## Structure & Governance Arrangements



South West London Fraud Partnership

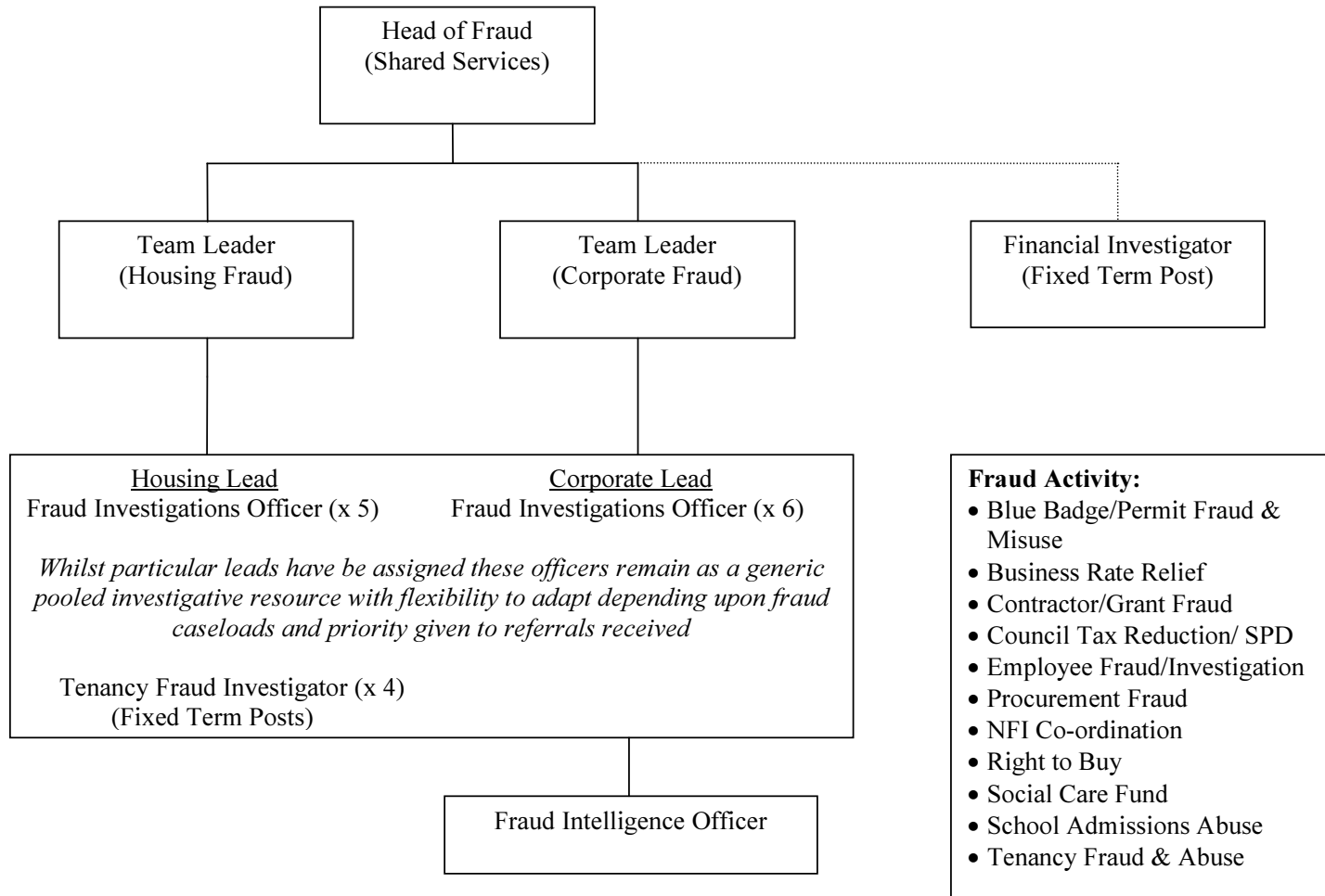
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**Incorporating the London Boroughs of** Merton, Richmond,  
Sutton, Wandsworth and the Royal Borough of Kingston

# Background to the SWLFP

- Following the Government's announcement to centralise the investigation of Benefit Fraud within the DWP, Council's stood to lose experienced trained investigators as staff were to transfer to the DWP's Single Fraud Investigation Service (SFIS)
- This presented a potential risk for councils in that there would be insufficient skilled officers to undertake any major investigation that might be required.
- To ensure that a sufficient resilience of investigative resource remains Kingston, Merton, Richmond, Sutton and Wandsworth Councils entered into a Shared Fraud Service, the South West London Fraud Partnership (SWLFP).

# SWLFP Structure





# Structure

To maintain the ability to assign resources to where fraud activity has been detected officers are not specifically assigned to any one authority.

However, to assist with maintaining consistent contact with individual authorities and partner organisations some officers have been designated as lead contacts.

The existing staff consist of a mixture of experienced investigators, some new investigators from a non local authority investigation background and some new officers.

Arrangements are in place to ensure that all permanent fraud investigators hold an accredited counter fraud specialist status thus satisfying the Local Government Transparency Code expectation.

# Governance - 1

## **SWLFP Steering Group**

Each Partner nominates a representative onto the Steering Group whose functions areas follows:

- To be the forum which ensures that this agreement operates efficiently and that there is effective joint working between the Parties
- To monitor the work of the Shared Fraud Service
- To make recommendations to a Party or Parties or all the Parties concerning the future work, resourcing or conduct of the Service
- The Steering Group shall hold a minimum of 4 ordinary meetings in every year

# Governance - 2

- The current Steering Group nominees are the Heads of Audit for each Authority
- Regular fraud updates are issued to all Heads of Audit and Directors of Finance, highlighting the issues identified in the fraud cases across the group, including the outcomes of any data matching exercises.
- An annual and interim report will be prepared for partner Audit Committees.
- The Heads of Audit are then responsible for ensuring that any control weaknesses identified are subsequently addressed.
- Each organisation is responsible for ensuring that its' affairs are managed in accordance with proper standards of financial conduct and for preventing and detecting fraud and corruption.



# Referrals

- Investigations are agreed (commissioned) by the Heads of Audit.
- We have a fraud referral email and contact number and where we receive referrals directly from staff, contractors or the public we will confirm the need for opening an investigation with the Head of Audit.
- Our aim is to respond to a referral within 48 hours, to either acknowledge that it is something that we can investigate or the refer onward or explain why the referral is something that is not for us to investigate (subject to discussion and agreement with the Head of Audit).



# Referrals - Fraud Activity

Whilst not an exhaustive list, we investigate referral on:

- Blue Badge/Permit Fraud & Misuse
- Business Rate Relief
- Contractor/Grant Fraud
- Council Tax Reduction/ SPD
- Employee Fraud/Investigation
- Procurement Fraud
- NFI Co-ordination
- Right to Buy
- Social Care Fund
- School Admissions Abuse
- Tenancy Fraud & Abuse



# Investigations - 1

We undertake investigations into alleged or suspected fraud and corruption and maintain an immediate response capability in this respect.

Trained staff undertake investigations in accordance with legislation, regulations and codes so as to ensure that actions are not prejudicial to the outcome of a case, and to preserve the rights of the individuals.

Non-financial irregularities concerning an employee's moral, ethical, or behavioural conduct or other unprofessional conduct are covered by the Partner's Codes of Conduct and should be resolved by the relevant Organisation, however we can provide assistance with complex cases where required.


# Investigations - 2

As part of any investigation, we will ensure that:

- All allegations are dealt with promptly and confidentially.
- All evidence that has been collected is handled in accordance with appropriate legislation such as Criminal Procedures and Investigations Act.
- Any interviews undertaken are conducted fairly and in line with appropriate legislation such as the Police & Criminal Evidence Act.
- All investigations are conducted in a timely manner, with the relevant Head of Audit and Service Manager being kept informed of progress.

# Investigations - 3

- At the conclusion of an investigation we will produce a report highlighting the findings and where appropriate make relevant recommendations.
- Should any disciplinary and/or criminal proceedings result from the report the relevant Organisation is responsible for undertaking such action and ensuring it complies with relevant legislation and their own internal procedures.
- Officers from the Shared Fraud Service would provide relevant support for any action including attending court and disciplinary hearings.



## **SWLFP Fraud Investigations – (2015/16 to end of January 2016)**

In total 1046 investigations have been worked on since April 2015. This includes some cases brought forward from the previous financial year.

From these 226 sanctions have been achieved which include:

- 67 properties recovered
- 14 housing applications reject
- 82 RTB applications withdrawn
- 40 parking permit abuse or misuse cases (35 criminal prosecutions and 5 official warnings)
- 8 employee related sanctions
- 4 other/external sanction
- 11 council tax reduction/discount fraud

# Contacts

| Name                                   | Position                                 | Telephone No  | Email Address  |
|--|--|---------------|--|
| Kevin Holland                          | Head of Fraud – SWLFP                    | 020 8871 6451 | <a href="mailto:kholland@wandsworth.gov.uk">kholland@wandsworth.gov.uk</a> |
| Lead Contact for Housing Fraud         |  |               |  |
| Lynn Sanger                            | Fraud Team Leader - Housing              | 020 8871 6453 | <a href="mailto:lsanger@wandsworth.gov.uk">lsanger@wandsworth.gov.uk</a>   |
| Lead Contact for Corporate Fraud       |  |               |  |
| Veronika Siggers                       | Fraud Team Leader – Corporate            | 020 8871 7063 | <a href="mailto:vsiggers@wandsworth.gov.uk">vsiggers@wandsworth.gov.uk</a> |
| Main Support Officers – Merton Council |  |               |  |
| Dan Voller                             | Fraud Investigations Officer - Corporate | 020 8871 7876 | <a href="mailto:dvoller@wandsworth.gov.uk">dvoller@wandsworth.gov.uk</a>   |
| Erin Barry                             | Fraud Investigations Officer - Housing   | 020 8871 8773 | <a href="mailto:ebarry@wandsworth.gov.uk">ebarry@wandsworth.gov.uk</a>     |

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SWLFP email for referrals: [SWLFP@wandsworth.gov.uk](mailto:SWLFP@wandsworth.gov.uk)

SWLFP Telephone **020 8871 8383**



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