LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE: 2025-26 Annual Counter Fraud Report	
REPORT OF: Executive Director Corporate Services	
FOR SUBMISSION TO: Audit and Corporate Governance Committee	**DATE:** 7 July 2026

SUMMARY OF REPORT

This report provides the Audit and Corporate Governance Committee with a summary of anti-fraud activities undertaken during the 2025-26 year. The report covers the period 1st April 2025 to 31st March 2026.

LOCAL GOVERNMENT ACT 1972 – ACCESS TO INFORMATION:
No documents have been used in the preparation of this report that are required to be listed.

Contact Officer:
Nasreen Khan
Head of Internal Audit, Investigations and Risk Management
5 Pancras Square
London
N1C 4AG
Telephone: 020 7974 2211
Email: nasreen.khan@camden.gov.uk

RECOMMENDATION

The Committee is asked to note the report.

Signed: As agreed by the Director of Finance

Date: 22nd June 2026

1. Purpose

1.1. This report is intended to support members of the Audit and Corporate Governance Committee in obtaining assurance that the Council has a sound framework of governance, risk management and internal control. It does this by providing information on the resources deployed on counter-fraud activity.

1.2. This report fulfils responsibilities under the Committee's Terms of Reference i.e.

- To consider the assessment of fraud risks and potential harm to the Council from fraud and corruption;
- To monitor Council policies on whistleblowing and the anti-fraud and anti-corruption strategy;
- To receive an annual report on the Council's usage of its powers under the Regulation of Investigatory Powers Act (RIPA).

1.3. The Local Government Transparency Code 2015 requires local authorities to publish details of their counter-fraud activity. This report provides an update on counter-fraud work undertaken by the Council's Anti-Fraud and Investigations Team for the 2025-26 year, covering the period 1st April 2025 to 31st March 2026.

1.4. The Head of Internal Audit, Investigations and Risk Management has responsibility for corporate counter-fraud related activity and reports annually to the Audit and Corporate Governance Committee on performance and outcomes of investigations conducted by the Council's Anti-Fraud and Investigations Team. This report also includes an update on the counter-fraud activity undertaken by the Council's Housing Investigations Team.

2. Corporate Investigations

2.1. The Council continues to take a robust approach to tackling fraud. The risk of serious fraudulent activity is included in the Council's Principal Risk Report and is monitored on an ongoing basis. Corporate Investigations are undertaken by the Council's Anti-Fraud and Investigations Team (AFIT), which forms part of the Internal Audit, Investigations and Risk Management service. The primary objective of AFIT is the prevention and detection of fraud, corruption and irregularity. The service structure comprises of three investigation officers within AFIT, all of whom are required to be professionally qualified to accredited counter-fraud specialist standard or equivalent.

2.2. AFIT is responsible for undertaking reactive investigations (i.e. investigations arising because of referrals received from employees, management, the public, members, etc.) and proactive investigations (i.e. investigations undertaken to proactively prevent and detect fraud). Details of proactive activity is included at sections 7-8 below. Reactive investigations include referrals received under the Council's whistleblowing policy. For the period covering 1st April 2025 to 31st March 2026, eight whistleblowing referrals were received. Details of these referrals are provided within the private appendix to this report.

2.3 As reflected within Table 1 below, for the period 1st April 2025 to 31st March 2026, AFIT received a total of 101 referrals of suspected fraud, theft or irregularity, including eight whistleblowing referrals. The 101 referrals in 2025-26 came from the following sources

- 90 referrals from employees (including Human Resources and management);
- 6 referrals from members of the public;
- 3 referrals from a Councillor, another Local Authority and a care agency;
- 2 referrals were anonymous.

2.4 Of the 101 referrals received, 68 referrals have been closed following the conclusion of investigatory work. 41 of the closed referrals were found to be substantiated and 27 were found to be unsubstantiated. Two cases have been substantiated but remain open pending further action. The remaining 31 referrals remain open and are subject to ongoing enquiries. Further analysis is provided below:

Table 1: Number of referrals substantiated per year

Period	1st April 2025 to 31st March 2026	1st April 2024 to 31st March 2025	1st April 2023 to 31st March 2024
Number of Referrals Received	101	120	102
Number Substantiated	43*	66**	67***

**In 2025-26, 34 referrals out of the 43 referrals substantiated between 1st April 2025 and 31st March 2026 related to Penalty Charge Notice (PCN) fraud (where drivers were found to have submitted false or misleading information in support of their appeal).*
***In 2024-25, 48 referrals out of the 66 referrals substantiated between 1st April 2024 and 31st March 2025 related to Penalty Charge Notice (PCN) fraud.*
****In 2023-24, 48 referrals out of the 67 referrals substantiated between 1st April 2023 and 31st March 2024 related to Penalty Charge Notice (PCN) fraud.*

2.5 A breakdown of the types of referrals received over the period 1st April 2025 to 31st March 2026 is provided in Table 2. A breakdown of referrals received per directorate for the same period is provided in Table 3. In both instances, figures for the year 2023-24 and 2024-25 have also been provided.

Table 2: Breakdown of referrals by type

Referral Type	1st April 2025 to 31st March 2026	1st April 2024 to 31st March 2025	1st April 2023 to 31st March 2024
Housing related	12	4	1
Identity / Right to work	-	1	2
Payment	9	12	12

Theft	3	2	6
Procurement	1	-	-
School admission	1	6	1
Data breach	2	9	1
Employment	18	14	12
False document	5	6	4
Police arrest	-	-	4
Capital/Savings	-	1	1
Harassment, inappropriate behaviour and intimidation	1	-	4
Conspiracy	3	3	1
Parking related (including PCN)	44*	56	52
Contractor	2	3	1
Impropriety	-	-	-
Favouritism / Nepotism	-	3	-
Total	**101**	**120**	**102**

**34 of the 44 parking related referrals have been substantiated by AFIT. Of the remaining ten referrals seven referrals remain open for investigation and three referrals have been closed as unsubstantiated.*

Table 3: Breakdown of referrals by Directorate

Directorate	**1st April 2025 to 31st March 2026**	**1st April 2024 to 31st March 2025**	**1st April 2023 to 31st March 2024**
Supporting Communities *(listed as Homes and Communities and Investment Place and Opportunity in 2025-26)*	-	28	21
Homes and Communities	29	-	-
Investment Place and Opportunity	8	-	-
Supporting People *(listed as Adults and Health and Children and Learning in 2025-26)*	-		11
Adults and Health	6	9	-
Children and Learning	6	2	-
Corporate Services	8	25	18
Corporate Services – Parking related	44	56	52
Total	**101**	**120**	**102**

Summary of investigation outcomes for 2025-26

2.6 59 of the referrals received for the period covering 1st April 2025 to 31st March 2026 contained allegations of fraud or malpractice allegedly committed by members of the public, companies, or other organisations. Outcomes of these referrals are as follows:

- 37 referrals have been substantiated (34 related to parking);
- 10 referrals were unsubstantiated, and
- 12 referrals remain open with enquiries ongoing.

2.7 The remaining 42 referrals received within this period relate to allegations of fraud or malpractice by Council employees. Outcomes of these cases are as follows:

- 6 referrals have been substantiated;
- 17 referrals were unsubstantiated, and
- 19 referrals remain open with enquiries ongoing.

Control enhancements

2.8 Following the completion of investigations and where relevant, AFIT aims to improve and strengthen controls by issuing investigation reports, which detail recommendations and share lessons learned to address any control weaknesses identified during the investigation. In 2025/26 recommendations included the enhancement of monitoring controls.

2.9 In addition, AFIT has also provided ad-hoc advice to management in relation to the design and implementation of anti-fraud measures and controls across a number of areas.

3. Blue Badge enforcement

3.1. The Blue Badge scheme is a national initiative to help disabled people and those with non-physical disabilities (such as people who are autistic, have a learning disability, dementia or a mental illness) to park close to their destination, either as a passenger or driver. While the badge is intended for on-street parking only, some off-street car parks, such as those provided by local authorities, hospitals or supermarkets, also offer benefits to Blue Badge holders. It is a criminal offence to misuse the Badge and misuse could lead to a fine of up to £1,000.

3.2. Fraudulent use of blue badges may include use of a counterfeit badge, use of a lost or stolen badge, or use of a badge belonging to a deceased person. Misuse of genuine badges may also arise from use of a badge when the holder is not present.

3.3. The benefits of undertaking enforcement action against fraudulent use of blue badges include:

- More space for genuine badge holders;
- Better management of the kerbside;
- As people are discouraged from using prime locations as long-stay parking, this means a greater turnover of visitors to high streets, and
- Improved traffic management and better air quality.

3.4. AFIT conduct blue badge patrols on a regular basis in order to combat and detect blue badge fraud. This involves officers from AFIT conducting patrols alongside Civil Enforcement Officers (CEOs). Additionally, AFIT has further established a joint-working protocol with Parking Services to combat blue badge misuse. As part of this arrangement, Parking Services deploy CEOs to perform blue badge patrols and relay information to AFIT to conduct real-time checks on the national blue badge database to establish any misuse or fraudulent use of blue badges being displayed within Camden. In addition to the scheduled blue badge patrols, AFIT and Parking Services also undertake ad-hoc reactive work to investigate referrals of suspected misuse that are received via other sources, including referrals from members of the public. In these instances, and where proportionate to do so, AFIT and Parking Services arrange for ‘targeted’ patrols to be undertaken in response to the information/intelligence received from referrals.

3.5. The statistics recorded in the table below detail the outcome of enforcement activity for the period 1st April 2025 to 31st March 2026. In addition to patrols, investigations were also undertaken in relation to specific referrals received and as a result of joint-working with Parking Services.

Table 5: Outcomes of street patrols

Activity	1st April 2025 to 31st March 2026	1st April 2024 to 31st March 2025	1st April 2023 to 31st March 2024
Street patrols	12	12	15
Vehicles inspected (approximate)	1,200	1,200	1,500
Referrals/allegation of misuse	92	87	74
Cases of misuse established	53	70	67
Penalty Charge Notices (PCNs) issued for misuse	65	66	61
Removals	16	26	16
Confiscations	16	26	22
Interviews	1*	8	16
Warnings	0	2	2
Cases referred to Legal Services	1	4	1
Successful prosecutions	1	4	1

**One interview was conducted in 25/26. The remaining interviews for 2025/26 cases have been carried forward over to 2026/27*

Table 6: Comparator data – Blue Badge prosecutions:

Activity	1st April 2025 to 31st March 2026	1st April 2024 to 31st March 2025	1st April 2023 to 31st March 2024
Cases referred to Legal Services	1	4	0
Successful Prosecutions	1	4	1

3.6. AFIT can receive referrals of suspected blue badge fraud from the public using the contact details in the 'How do I report fraud' page on the Council's website. Referrals can also be received from other services, for example, Parking Services. For each referral received, AFIT made enquiries to determine whether sufficient information was provided, or available via other sources, to conduct an investigation and potentially proceed to a prosecution/other action being taken.

3.7. In addition to blue badge fraud, AFIT has also worked with officers within Parking Services to investigate cases of potential Penalty Charge Notice (PCN) fraud, where drivers submit false or misleading documentation in support of their PCN appeal.

3.8. On 30th May 2025, AFIT participated in a London-wide "*Blue Badge Day of Action*". The day of action was organised by the London Borough of Lambeth and facilitated by London Councils. The day of action involved all London boroughs, and some local authorities across the country, having officers out on the streets conducting patrols in their respective areas to identify as many Blue Badge infringements as possible. The next day of action has yet to be scheduled.

4. Housing Investigations

4.1. A report published by the Fraud Advisory Panel and Tenancy Fraud Forum (TFF) in 2023[1] estimated that occupants of around one in twenty social housing homes are linked to some form of tenancy fraud.

4.2. The Housing Investigations team (HIT) in the Council's Supporting Communities directorate work with other housing teams to make sure that those who live in council homes, or who apply to buy them, are entitled to. The team also investigates tenancy fraud and related tenancy condition breaches, including illegal subletting, non-occupation, undeclared ownership of other properties, fraudulent right to buy applications, fraudulent succession applications and false housing applications. HIT can also provide support to local Housing Associations with these areas.

4.3. All HIT officers have a professional certificate in investigation skills or the equivalent. Officers focus either on the north or south of the borough linking with neighbourhood housing teams for strong collaborative working and intelligence sharing. The team consists of four investigation officers and a team manager.

[1] Lost Homes, Lost Hope April 2023

4.4. The table below provides data from 1 April 2025 to 31 March 2026. It also includes figures for the previous two years:

Table 7: Housing Investigations Team cases

Activity	1st April 2025 to 31st March 2026	1st April 2024 to 31st March 2025	1st April 2023 to 31st March 2024
Total properties recovered	55	70	62
Ineligible succession or assignment applications	23	15	33
Ineligible right to buy requests	25	48	10
Sub-letting	-	2	7
Other unauthorised occupancy (keys passed on)	2	3	5
Non- occupation and abandonment	5	2	7
Unlawful profit recovered / compensation payments	£40,654.86	-	£15,071.71

4.5. Other cases are with the Council's lawyers or awaiting a court hearing date or appointment with the court bailiffs. It can take many months for the courts to arrange an eviction date after a Possession Order has been granted and, when an unauthorised occupant is not making payments for their use and occupation, these delays can result in a significant loss of rental income. There remains a significant backlog in the court system.

4.6. Whilst there have been different methods of measuring the cost of tenancy fraud, a TFF report from October 2024[2] has calculated the London average is now

[2] Tenancy Fraud London 2025 - Learning the lessons Para 5, Page 5
[3] [ARCHIVED CONTENT] (nationalarchives.gov.uk) Para 21, page 10
[4] Tenancy Standard - GOV.UK (www.gov.uk) Para 2.1.4 accessed 15 May 2024

£66,000 per home. Other calculations have used the significantly higher rebuild value of a social housing home. Applying the TFF figure to the 55 homes recovered in Camden last year equated to £3.63 million (55 homes recovered in 2025-26 period at £66,000 per home).

4.7. The actual figure in a high demand and high cost area like Camden will be significantly higher, especially taking into account the scarcity and cost of temporary accommodation. In addition, the TFF figure does not reflect that detected unauthorised occupiers are significantly less likely to make payments for their use and occupation than tenants are to pay their rent.

4.8. In 2011 the Audit Commission said "Tackling housing tenancy fraud is one of the most cost-effective means of making social housing properties available to match the demand from those in genuine need".[3]The work that HIT and other housing teams do to prevent, identify, and address housing fraud is critical given the scarcity of social housing. It helps to deliver the We Make Camden Ambition that everyone in Camden should have a place they call home. It helps ensure that council homes are not lost from the stock and are available to let to people in housing need. When residents see tenancy fraud being tackled it increases public confidence in the Council as well as acting as a deterrent.

4.9. The Regulator of Social Housing has set out an expectation in the updated "Tenancy Standard"[4] in the regulatory framework for social housing in England that "Registered providers must take action to prevent and tackle tenancy fraud".

4.10. As well as making sure that applicants are eligible to succeed to a tenancy or to buy a council home, HIT is also an expert resource providing support with complex tenancy management issues. Joint tenants succeed to a tenancy automatically when a joint tenant dies and when a sole tenant asks to enter into a joint tenancy with someone else HIT carry out checks to make sure that the proposed joint tenant is eligible. They provide similar support when a tenant asks to assign their tenancy to another household member. As well as protecting the Council's assets these checks can also identify potential safeguarding concerns helping to protect vulnerable tenants from exploitation.

4.11. HIT also highlight when a successor is living in a home that has more bedrooms than they need. This helps to ensure that successors in this situation are encouraged to downsize to free up larger homes for families when this is appropriate. It also identifies when successors may benefit from money advice as the bedroom tax will affect them further down the line if they are below state pension age and receive Universal Credit or Housing Benefit towards their housing costs. HIT were instrumental in thirteen successors downsizing in 2025-6, freeing up homes for families.

4.12. Whilst HIT are focussed on recovering council homes when the occupants are not entitled to a council tenancy, the team remain mindful that many unauthorised occupants may not have known they were living in a council home or may not have realised there was anything wrong with moving back into the home they grew up in as a child after a parent died. Part of the team's work includes linking

---

[5] [Report an unlawful occupancy - Camden Council]()

occupiers to help and advice about their housing options, especially if they are at risk of homelessness. When occupants engage with this support it can help to resolve an issue of unauthorised occupancy much more quickly than the legal enforcement route, and at significantly reduced cost.

4.13. HIT can be contacted via an on-line form on the Council's website[5] or at TenancyFraud@camden.gov.uk.

5. Whistleblowing

5.1 The Council has facilities available for concerns to be reported confidentially.

5.2 As outlined in section 9 below, the Council's whistleblowing policy was last updated in June 2023 and is currently being updated in July 2026.

5.3 AFIT has published information for employees on the Council's intranet explaining how they can report suspicions of fraud or impropriety.

5.4 If any employee of the Council knows of or suspects any irregularities concerning staff, cash, assets or any other financial mismanagement or impropriety then they must inform the Head of Internal Audit, Investigations and Risk Management. Employees can also contact investigation officers from AFIT directly. Employees could also consider first reporting their suspicions to their line manager. However, if this is not appropriate then they should inform AFIT. A 'How do I report fraud' page is also available via the Council's website.

5.5 Where appropriate, the Council also signposts whistleblowers to the organisation Protect (previously known as Public Concern at Work), who provide a free whistleblowing advice service. Details of this organisation can be found here – Protect - Speak up stop harm - Whistleblowing Homepage

5.6 In line with the whistleblowing policy, AFIT will undertake an assessment on receipt of a whistleblowing referral, irrespective of whether the referral was received anonymously or from an identified individual. If the referral meets the criteria for whistleblowing, an investigative pathway is agreed. If the allegation relates to matters within AFIT's remit e.g. fraud, misappropriation, wrongdoing, AFIT would lead the investigation. However, if the allegation relates to matters outside the remit of AFIT, for example employee grievance matters, then the matter would be referred to the relevant area e.g. People and Inclusion (formerly HR) for further consideration.

5.7 A national whistleblowing helpline overseen by the National Society for the Prevention of Cruelty to Children (NSPCC) is available for employees wishing to raise concerns about a child at risk of abuse.

5.8 Between 1st April 2025 and 31st March 2026, the Council received eight referrals that met the criteria for whistleblowing. Details are included in Appendix A (confidential appendix).

6. Regulation of Investigatory Powers Act 2000 (RIPA)

6.1 The purpose of RIPA is to:

- Provide a statutory, European Court of Human Rights (ECHR) compliant framework for the use of intrusive investigative techniques;
- Update previous legislation in the light of technological and legal developments, and
- Regulate and control the use of intrusive techniques by public authorities, introducing national standards.

6.2 Under Part II of the Act, local authorities have powers to conduct 'directed covert surveillance', subject to judicial order approving such activity. We cannot conduct 'intrusive surveillance' i.e. within a private residence.

RIPA policy and relevant officers

6.3 The Council has a policy for RIPA to specifically provide guidance to any officer who wishes to gather intelligence for their investigation by the use of directed covert surveillance or from communications data. Failure to follow this policy could have consequences for the Council. As a general rule, the use of RIPA should only be the last resort where the information being sought for an investigation cannot be obtained by any other means.

6.4 Camden manages its use of surveillance through a central system which is overseen by the Head of Internal Audit, Investigations and Risk Management, who has the designation of Senior Responsible Officer (SRO) for RIPA purposes and is responsible for maintaining the Council's corporate system regarding RIPA authorisations.

6.5 The Council adopted the use of a trained RIPA Co-ordinating Officer to ensure the efficient processing of applications. This ensures that there is a standardised approach to the use of the powers as well as providing monitoring of the application forms. Named Authorising Officers have been designated throughout the authority and are responsible for authorising surveillance activity.

6.6 As part of the statutory requirements of the RIPA, all Authorising Officers and investigators must be trained before any application for activities under this Act can be submitted or authorised. Additionally, in order to ensure their knowledge of RIPA is current, regular refresher training (at least triennially) must be completed. In anticipation of the departure of the former Chief Executive at the end of summer 2025, the incoming Chief Executive completed RIPA training in July 2025 to ensure that the Council had an Authorising Officer at Chief Executive level. Officers from investigation and enforcement teams across the Council, including representatives from People and Inclusion and Legal Services, received RIPA refresher training in April 2026. The two Authorising Officers (excluding the Chief Executive as outlined above) were trained in July 2025 and in May 2026. The training was delivered by Act Now Ltd who provide specialist RIPA training.

6.7 In the period 1st April 2025 to 31st March 2026, the Council has not exercised its RIPA powers in respect of directed covert surveillance or Covert Human Intelligence Source (CHIS), nor were any applications for communications data submitted. However, the Council remains compliant should the situation arise where authorisations would be required. In terms of background, the Regulation of Investigatory Powers Act 2000 (RIPA) ('the Act') clarified and introduced regulations to update on the use of directed covert surveillance and the interception of communications by law enforcement and security agencies. It was intended to ensure that these investigation powers were used in accordance with the Human Rights Act 1998 (HRA) and to take account of technological advances. Over time, many of the provisions under the Act have been replaced by relevant provisions of the Investigatory Powers Act 2016 (the ‘2016 Act’).

RIPA and the National Anti-Fraud Network (NAFN)

6.8 All local authorities who wish to access communications data under the 2016 Act are required to become members of National Anti-Fraud Network (NAFN) and use their shared Single Point of Contact (SPoC) services. This Act governs applications for communications data; it is the legal gateway for local authorities to obtain such information. The Council has not submitted any application for communications data for the period 1st April 2025 to 31st March 2026 as outlined in paragraph 6.7 above.

6.9 NAFN is a not-for-profit public sector organisation. It is managed by and for the benefit of its members, delivering services which enable effective financial governance and efficient acquisition of data, as well as acting as the hub for intelligence alerts and providing best practice examples of process, forms and procedures. NAFN is also recognised by key government departments and agencies as the preferred single point of contact for specialist data enquiries. This enables them to establish secure, central links to information providers and deliver a faster service.

External inspection and monitoring of RIPA use

6.10 Part II RIPA inspections are conducted by the Investigatory Powers Commissioner’s Office (IPCO). The primary objectives of IPCO inspections are to:

- Ensure that the system in place for directed covert surveillance and CHIS is sufficient for the purposes of the Act and that all relevant records have been kept;
- Ensure that all directed covert surveillance and CHIS has been carried out lawfully and in accordance with the Human Rights Act, Part I Chapter II of RIPA and the associated Code of Practice;
- Provide independent oversight to the process and check that the directed covert surveillance and CHIS is necessary and proportionate to the conduct being authorised;
- Ensure that errors are being ‘reported’ or ‘recorded’ and that the systems are reviewed and adapted in the light of any exposed weaknesses or faults;
- Identify good and bad practice, and
- Ensure that persons engaged in directed covert surveillance and CHIS are adequately trained and are aware of the relevant parts of the legislation.

6.11 In line with the scope outlined at section 6.10 above, the Council received a notification from IPCO on 20th June 2025 that a triennial inspection was due. However, IPCO also advised that following a review of how they conduct their oversight of local authorities, physical inspection site visits were no longer routinely taken. Instead, the local authority would provide a written update on its compliance with the legislation by completing a questionnaire to enable IPCO to assess whether further remote or on-site inspection is required. The Council received the questionnaire with the notification on 20th June 2025 and completed and returned the questionnaire to IPCO on 21st July 2025.

6.12 The findings from this inspection were reported by way of a letter to the Chief Executive on 30th July 2025. Outcomes from inspection were positive. The IPCO inspection letter stated that the Council's responses to the inspector provided assurance that ongoing compliance with RIPA and the Investigatory Powers Act will be maintained. Therefore, the IPCO had concluded that the Council would not require further inspection in 2025. IPCO has advised that the next inspection is due to take place in 2028.

6.13 Following the inspection, one minor recommendation was made:

- To update some of the paragraphs in the RIPA policy relating to the communisations data authorisation process i.e. to substitute any reference to the Office of Communications Data Authorisations (OCDA) with IPCO as OCDA became part of IPCO in 2024, and to amend one paragraph relating to the authorisation period for juvenile CHIS. The policy was updated in August 2025 to implement the recommendation. However, a further update of the policy has been made with details of the amendments included at section 9 of this report.

6.14 Further to the Home Office's revocation of the local authority's Single Point of Contact (SPoC) accreditation so that all applications for communications data are submitted to NAFN, inspections under Part I Chapter II of RIPA by the IPCO are now carried out at NAFN's offices and the Council may be contacted if an application has been made during the relevant period. The reason for this contact would usually be for clarification to queries raised by the inspector on an application.

6.15 The Council submits statistics of all surveillance activity to the IPCO annually and for the period 1st January 2024 to 31st December 2025 no directed covert surveillance was conducted by the Council. The IPCO was advised of this on 13th January 2026. All activities under RIPA are reported to the Audit and Corporate Governance Committee annually.

7. Proactive work plan, fraud awareness and principal risk

7.1 The Council takes a zero-tolerance approach to fraud and serious fraudulent activity has been included as a principal risk in the Council's Principal Risk Report. A number of controls and actions are identified within the Principal Risk Report to demonstrate how this risk is being mitigated. Some of the controls and actions being taken include:

- AFIT provide controls advice and fraud awareness sessions to service areas as applicable;
- Internal Audit and AFIT work closely to ensure that intelligence is shared to support the identification of fraud risks and to ensure that Internal Audit are able to make recommendations to enhance controls and prevent the recurrence of fraud;
- Fraud risks feed into the annual audit and investigations plan. Delivery of the plan ensures that recommendations are made to address control weaknesses;

- A mandatory anti-fraud training module for all Council staff is in place;
- The Council participates in the National Fraud Initiative exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud and error.

7.2 Services continued to seek proactive anti-fraud input in 2025-26, with proactive anti-fraud input sought in a number of areas including housing and finance.

7.3 AFIT's proactive suite of work also includes fraud awareness training. All staff are required to complete online learning on fraud awareness, which forms part of the Council's suite of mandatory learning modules. The fraud awareness module was updated in 2024-2025, as part of the wider corporate mandatory learning package refresh, and all officers were required to complete the training. Regular compliance reports are produced and reviewed by People and Inclusion and senior management, which summarises the data and statistics detailing the number of staff who have completed the mandatory training modules. The completion of all mandatory learning modules is also linked to officers' annual performance reviews). From 1st April 2025 to 31st March 2026, 649 employees have completed the fraud awareness module. This number primarily relates to new starters and returning employees. AFIT have updated the module in 2026-27 ahead of the next cycle of mandatory leaning for all staff.

8 Proactive anti-fraud initiatives – utilising data

8.1 Camden is committed to continuously improving, enhancing and developing practices and techniques for the prevention and detection of fraud and corruption. As part of this commitment, the team utilises data analytics tools, where available, to enhance its proactive approach to anti-fraud work. AFIT also continues to explore new initiatives to use data in a way that enables a smarter approach to identifying fraud.

National Fraud Initiative (NFI)

8.2 The National Fraud Initiative (NFI) is a biennial exercise ran by the Cabinet Office, which matches electronic data within and between public and private sector bodies to prevent and detect fraud, including police authorities, local probation boards, fire and rescue authorities, as well as local councils and a number of private sector bodies.

8.3 At the beginning of each exercise, Camden is required to upload a number of datasets onto the NFI's secure application, including Housing Benefits; Payroll; Pensions; Housing tenancy; Housing waiting lists; Right-to-Buy; Blue Badges; Council Tax; and Resident Parking Permits. A number of external datasets are also provided by third parties, including HMRC, Companies House; and the DWP.

8.4 The latest NFI data matching exercise commenced in February 2025 and produced 9,822 matches for Camden (source: NFI web portal for Camden). Whilst there are a high number of matches, local authorities are not required to review all matches, and the decision whether to undertake a full investigation into each match is at the discretion of the local authority. To this end, matches are assigned with either a high, medium or low priority rating, and the Cabinet Office recommends that the high priority matches are reviewed first, and all outcomes are recorded on the NFI's secure web application.

8.5 Matches are returned in 14 separate categories, including Blue Badge, Council Tax, Housing Benefit, Payroll, Housing Tenants, Housing Waiting List, Right to Buy, Creditors, Pensions and Residents' Parking Permits.

8.6 Matches are allocated to and investigated by a number of teams across the Council, including AFIT, the Housing Investigations Team, Accessible Transport Team, Parking and Council Tax and Business Rates teams.

8.7 The Cabinet Office publishes a report at the end of each exercise summarising what local authorities have saved cumulatively as a result of the NFI exercise. The last exercise (from 2022 to 2024) enabled participating organisations to prevent and detect £510.1 million fraud and error in the period 1st April 2022 to 31st March 2024; the report, published in February 2025, can be accessed here.

Enhanced Hub

8.8 In December 2023, the Council signed up to the NFI's Enhanced Hub for a two-year period and this was extended in 2025 for a further two years. The Enhanced Hub is a new user-based system where data uploads can be made more frequently than the biennial NFI exercise and is anticipated that it will provide a greater opportunity to detect fraud and/or error. The datasets matched will be similar to those in the biennial exercise.

Multiple working

8.9 The Council has signed up to the NFI's London multiple working exercise. The exercise involves the matching of datasets from certain recruitment agencies and managed service provider partners with the local authority's payroll.

8.10 The objective of this exercise is to identify employees and agency staff working for more than one organisation at the same time and failing to declare multiple working.

9 Policies and procedures

9.1 In line with good practice, AFIT seeks to review its policies and procedures at regular intervals. Updated policies and procedures were presented to the Committee in June 2023. Policies and procedures have now been updated in line with good practice and are included at Appendices B to H. Amendments to existing policies have been highlighted in grey for ease of reference.

9.2 The following polices have been updated:

i. Anti-Fraud and Corruption Strategy and Policy (Appendix B);
ii. Whistleblowing Policy (Appendix C)

iii. Anti-Bribery Policy (Appendix D);
iv. Money Laundering and the Proceeds of Crime Policy (Appendix E);
v. Corporate Prosecutions, Sanctions and Redress Policy (Appendix F);
vi. RIPA Corporate Authorisation Policy (Appendix G);
vii. Social Media for Investigations Policy (Appendix H).

9.3 **Anti-Fraud and Corruption Strategy and Policy**

The strategy and policy was last presented to the Committee in June 2023. Minor edits have been made as follows:

- Reference to the offence “failure to prevent fraud” under the new Economic Crime and Corporate Transparency Act 2023 has been included;
- Reference to the Crime and Policy Act 2026 has been included;
- Reference to the change in name for Action Fraud to Report Fraud has been included;
- Web links have been updated as necessary.

9.4 **Whistleblowing policy**

The policy was last presented to the Committee in June 2023. Minor edits have been made as follows:

- The scope of the policy has been updated at section 1.3;
- Reference to the modern slavery procedure has been included;
- Further provisions related to anonymous reports and reporting externally have been included;
- Web links have been updated as necessary.

9.5 **Anti-Bribery Policy**

The policy was last presented to the Committee in June 2023. Web links have been updated as necessary. Minor edits have been made as follows:

- Reference to the Procurement Act 2003 guidance.

9.6 **Money Laundering and the Proceeds of Crime Policy**

The policy was last presented to the Committee in June 2023. Minor edits have been made as follows:

- Reference to an update of money laundering legislation has been included;
- Web links have been updated as necessary.

9.7 **Corporate Prosecutions, Sanctions and Redress Policy**

The policy was last presented to the Committee in June 2023. Minor edits have been made as follows:

- Reference to adhering to the Regulators’ Code;
- Amended the Housing Investigations Team’s prosecution procedure;

- Reference to reporting to the Audit and Corporate Governance Committee has been included;
- Amended references to Executive Director Corporate Services to the Section 151 Officer (Director of Finance);
- Web links have been updated as necessary.

9.8 **RIPA Corporate Authorisation Policy**

The policy was last presented to the Committee in June 2023. Minor edits have been made as follows:

- As per section 6.13 above, the recommendations emanating from the IPCO inspection in July 2025 have been incorporated;
- The list of Authorising Officers has been updated;
- Reference to non-RIPA procedure has been included;
- Web links have been updated as necessary.

9.9 **Social Media for Investigations Policy**

The policy was last presented to the Committee in July 2025. Web links have been updated as necessary.

10 Legal Comments of Borough Solicitor

10.1 There are no legal implications arising from this report. Legal advice and guidance has been provided, where appropriate, in relation to the enforcement cases and initiatives which have taken place across the Council during 2025/26 and which are detailed in this report and the policies presented have been subject to legal review.

11 Finance Comments of the Executive Director Corporate Services

11.1 The Executive Director Corporate Services has been consulted and comments are incorporated within the body of the report.

12 Environmental implications

12.1 There are no known environmental implications arising from this report.

13 Appendices

Appendix A: Whistleblowing update (private appendix)
Appendix B: Anti-Fraud and Corruption Strategy and Policy
Appendix C: Whistleblowing Policy
Appendix D: Anti-Bribery Policy

Appendix E: Money Laundering and the Proceeds of Crime Policy
Appendix F: Corporate Prosecutions, Sanctions and Redress Policy
Appendix G: RIPA Corporate Authorisation Policy
Appendix H: Social Media for Investigations Policy