

Assessment by the
Benefit Fraud Inspectorate

**Kingston Upon Hull
City Council**

May 2001



Highlighted parts of this report are omitted from the published version as they may assist fraudsters, contain confidential information or unnecessarily identify individuals.

Copies of BFI reports are available from:

The DSS Library
Room 114
The Adelphi
1 – 11 John Adam Street
London
WC2N 6HT

Tel: 020 7962 8176

Fax: 020 7962 8491

You can also e-mail requests to
bfi-distribution@dpw.gsi.gov.uk

BFI reports are also available from the internet under
Reports and Publications at <http://www.bfi.gov.uk>

Contents

<i>Foreword</i>	7
<i>Management summary</i>	9
<i>Recommendations</i>	11
<i>Findings</i>	15
Introduction	15
Making sure the strategy works	17
Getting it right	23
Keeping it right	29
Putting it right	35
<i>Abbreviations</i>	45

Foreword

It was clear from initial meetings between Kingston upon Hull City Council (KUHCC) and the Benefit Fraud Inspectorate (BFI) that the inspection would be conducted on a partnership basis and that KUHCC was very keen to use the scheduled full inspection to improve its benefit administration and counter fraud performance. KUHCC was open about the areas where it experienced difficulty or knew of shortcomings.

Before the inspection process was fully underway the Department of Social Security (DSS) announced an initiative to provide expert help teams to help local authorities improve benefit administration. KUHCC elected to be one of the first local authorities to participate in the initiative.

To fit in with the expert help team's work and timetable, KUHCC, BFI and DSS agreed that BFI would provide an assessment of KUHCC performance, rather than a full inspection and report.

This jointly agreed assessment (hereinafter referred to as a report) will form the baseline and framework to be used by KUHCC and the DSS expert help team to improve effectiveness and security in key areas of benefit administration. KUHCC participated fully and positively in the assessment, confirming its commitment to improving its level of performance in benefit administration and counter fraud.

Chris Bull
Director, BFI
KUHCC

Ian Crookham
Chief Executive,

Management summary

1.1 This report covers the BFI assessment of KUHCC. The on-site phase of the assessment took place in February 2001.

1.2 We found that the benefits and counter fraud service in KUHCC was in a state of transition, with insufficient assurance about whether its systems are secure and error-free.

1.3 Its current operations have been heavily influenced by the legacy of the various management styles and practices in force before KUHCC brought benefits together into one management unit from April 2000. The changes needed to effect a full transition to a modern, integrated, effective and secure service are still to be brought about.

1.4 We saw examples of encouraging work. These included:

- a good single claim form, designed in line with BFI guidance
- the introduction of the government's Verification Framework (VF), aimed at safeguarding the gateway to benefit
- an active approach to liaison with Housing Associations (HAs), and plans to spread this more widely
- training of new staff being given proper priority
- prosecutions and other sanctions against fraudsters.

1.5 KUHCC's performance is not helped by the absence of a corporate strategy. As a consequence KUHCC does not have a clear vision of the service it wishes to provide. Although the 2 parts of the service (Rent Rebate and Rent Allowance) were brought together under the operational command of the Director of Community Services from April 2000, the merger has not, as yet, been effective.

1.6 There are inconsistencies between the 2 strands of the service which lead to confusion and inefficiency. There is no single set of guidance for processing staff and a lack of cohesion between the various sections. This can lead to claimants being treated unequally. There is a lack of some basic management information, and reason to doubt the reliability of what is available. This, together with deficiencies in the checking regime, makes us question how effectively performance is managed. For example, we saw evidence of backlogs of claims and requests for reviews dating back to May 2000.

Management summary

1.7 There are some successes in counter fraud work but it does not have a high profile in KUHCC and is apparently not seen as integral to the delivery of benefits. There is some doubt about the quality of recent investigations. KUHCC does not make sufficient use of available intelligence about fraud risks to target resources effectively. The possibility of internal fraud is not given enough attention.

1.8 Judging the effectiveness of overpayments recovery work is frustrated by the lack of routine management information.

1.9 Many of the problems we identified can be addressed by the application of basic management techniques. These would include using available information, checking, resolving differences of approach, deciding on priorities, co-ordinating, communicating, and planning. In addition, KUHCC needs to decide what sort of integrated service it intends to deliver in future, and plan its implementation.

1.10 KUHCC has already acknowledged that it needs to make a concentrated effort to raise standards. We saw evidence of this in a number of improvement initiatives and in a draft proposal to re-structure the service. This includes setting up a team to concentrate on key areas.

1.11 More immediately, KUHCC has accepted the offer of the services of a government expert help team, the first local authority (LA) to do so. Our draft findings were made available to the help team and KUHCC from March 2001.

1.12 We are grateful to staff and managers in KUHCC for their co-operation during this inspection.

Martin Moss

Inspection Manager

Recommendations

Making sure the strategy works – recommendations	
We recommend that:	Paragraph
<ul style="list-style-type: none"> • KUHCC needs to put in place appropriate strategies for benefits and counter fraud work which are consistent with the government’s strategies to combat fraud and error. 	2.18
<ul style="list-style-type: none"> • KUHCC should introduce consistent, co-ordinated methods of working which treat claimants equally and are supported by reliable management information. 	2.33
<ul style="list-style-type: none"> • KUHCC should plan the transition to an integrated service carefully and manage the change with particular attention to the human resource aspects. 	2.35
<ul style="list-style-type: none"> • KUHCC should introduce an IT security policy. This policy should be underpinned by an assurance regime aimed at preventing and deterring internal fraud. 	2.40

Getting it right – recommendations	
We recommend that:	Paragraph
<ul style="list-style-type: none"> • KUHCC should ensure that the requirements of VF are followed in every respect, including frequency of visiting and asking for best evidence. 	2.59
<ul style="list-style-type: none"> • KUHCC should ensure that sufficient staff are trained in the use of the RAT, that both available RATs are operated, and that the service is prompt. 	2.66
<ul style="list-style-type: none"> • KUHCC should ensure that work involving RS is managed effectively. This includes: <ul style="list-style-type: none"> – making prompt referrals – monitoring performance against SLA targets – keeping statistics and using them to effect improvements where possible – ensuring referrals are made in all appropriate cases, including HA cases where appropriate. 	2.70
<ul style="list-style-type: none"> • KUHCC should ensure that cases for checking are selected securely from all possible cases and cover all activities. Checkers’ findings should be recorded and analysed so that trends, training and management needs can be identified for action. 	2.75
<ul style="list-style-type: none"> • KUHCC should analyse where delays are occurring and take action to minimise them. For example, KUHCC should ensure, using targets and management checks, that claim documents are passed to assessment teams promptly. 	2.81
<ul style="list-style-type: none"> • KUHCC needs to develop a reliable method of producing accurate statistics to inform performance management. 	
<ul style="list-style-type: none"> • KUHCC should use training, guidance and management checking to make sure that POAs are made in all appropriate cases. 	2.83
<ul style="list-style-type: none"> • KUHCC should do its own monitoring of the SLA with BA and ES, to identify and improve areas of weakness. 	2.87

Keeping it right – recommendations

We recommend that:	Paragraph
<ul style="list-style-type: none"> • KUHCC should make sure that its renewal timetable complies with Reg 72(14) and forms are not issued more than 8 weeks before the benefit end date. 	2.92
<ul style="list-style-type: none"> • KUHCC should pursue all failed renewals to make sure that benefit is kept right at all times. 	2.92
<ul style="list-style-type: none"> • KUHCC should consider how the flow of renewal claims can be managed (subject to legal requirements) to avoid peaks and troughs. 	2.92
<ul style="list-style-type: none"> • KUHCC must revise its notices of determination to ensure full compliance with the law. 	2.96
<ul style="list-style-type: none"> • KUHCC should set benefit periods tailored to individual circumstances to keep benefit payments right even if changes of circumstances occur. This should be monitored by management checking, with results analysed and fed back to aid improvement. 	2.103
<ul style="list-style-type: none"> • KUHCC should use the information derived from its counter fraud work such as HBMS referrals to improve its administrative efficiency and security. 	2.103
<ul style="list-style-type: none"> • KUHCC should visit a proportion of claimants receiving crossed giros and BACS payments to detect and prevent non-residency fraud and error. 	2.109
<ul style="list-style-type: none"> • KUHCC must, before making direct payments to landlords, ensure that the “fit and proper person” test is applied. 	2.115
<ul style="list-style-type: none"> • KUHCC should ensure that it provides an equally good level of service to all claimants whatever their tenure type. 	2.115
<ul style="list-style-type: none"> • KUHCC should ensure that outstanding requests for review are actioned promptly at all stages. KUHCC should introduce a management check aimed at achieving this. 	2.119
<ul style="list-style-type: none"> • KUHCC should introduce a comprehensive, accurate and consistent set of guidance for staff, and make sure that it is kept up to date. 	2.124
<ul style="list-style-type: none"> • KUHCC should ensure that it has a consistent and comprehensive approach to training, building on the best features of its current variety of arrangements. KUHCC should undertake a training needs analysis and make sure that it includes any needs arising from its organisational restructuring. 	2.124

Putting it right – recommendations	
We recommend that:	Paragraph
<ul style="list-style-type: none"> • KUHCC should review its current overpayments procedures and ensure that a new approach is introduced to give assurance that overpayments are identified, classified and (where appropriate) recovered effectively. This approach should use consistency of treatment for all claimants. 	2.134
<ul style="list-style-type: none"> • KUHCC should ensure that it collects, analyses, reports and uses accurate information designed to help manage overpayments performance effectively. 	2.134
<ul style="list-style-type: none"> • KUHCC should introduce a programme of mandatory fraud awareness training (at least once a year) for all benefits staff and other officers likely to have contact with claimants. 	2.149
<ul style="list-style-type: none"> • KUHCC should regularly analyse its referrals data for trends and inconsistencies and take action to ensure that fraud referrals are numerous and of good quality. 	2.149
<ul style="list-style-type: none"> • KUHCC should review the value of its current hotline arrangement and consider sharing the costs of operating and publicising a local hotline with neighbouring authorities. 	2.156
<ul style="list-style-type: none"> • KUHCC should ensure that regular management checks are done on investigation files. These should address: <ul style="list-style-type: none"> – if all lines of enquiry are being pursued – unnecessary delays – the quality of investigation – legal requirements – whether unpromising cases should be closed. 	2.168

Findings

Introduction

2.1 This report seeks to:

- assess KUHCC's current Housing Benefit (HB) and Council Tax Benefit (CTB) performance
- assess KUHCC's own analysis of the current problems that it needs to tackle, and make recommendations for any variation needed to this assessment
- provide a baseline for KUHCC's work to tackle identified problems.

2.2 Information for this inspection and presented in this report was gathered from a range of sources, including KUHCC and DSS.

2.3 KUHCC has recently volunteered to receive help from the government's HB expert help team. Its report will provide a key starting point for KUHCC's work.

2.4 In this section we provide some basic information on KUHCC. In subsequent sections we report on the 4 elements of the government's strategy:

- **getting it right** – making sure benefit payments are correct from day one
- **keeping it right** – ensuring payments are adjusted as circumstances change
- **putting it right** – detecting when payments go wrong and taking prompt action to correct them, with appropriate penalties to prevent a recurrence
- **making sure the strategy works** – monitoring progress, evaluating the strength of defences and adjusting them in the light of experience. In this report, this section comes first.

Benefit expenditure and caseload

2.5 Benefit expenditure in KUHCC in 1999/2000 was £87.3 million. This represents 20% of KUHCC's gross revenue expenditure of £445 million.

2.6 Of this, £39.3 million was paid to council tenants as Rent Rebate (RR). Some £32.8 million was paid to private tenants, landlords and HAs as Rent Allowance (RA).

2.7 On 29 November 2000 KUHCC's benefit caseload was 68,846.

Background

2.8 Up to April 2000, HB and CTB claims from tenants in private sector accommodation and those from council tenants were processed under separate management arrangements in different directorates.

2.9 Following a Best Value review, KUHCC decided to unify the delivery of the service. From April 2000, the Community Services Directorate took over responsibility for administering HB and CTB. It also took on responsibility for the benefit fraud investigation and advice unit (IAU).

2.10 The unification of the benefits service, proposed in an internal audit (IA) report in 1995 but not pursued at the time, is in line with KUHCC's *Hull Connect* initiative which aims to develop a "one stop shop" approach to delivering services.

2.11 KUHCC told us that bringing the 2 halves of the benefits service together presented a number of challenges. These included addressing differences in management and culture, inconsistency of practice and varying expectations. At the time of our inspection the 2 halves had been put under one senior manager but practical integration was still being planned.

Methodology

2.12 The HB expert help team's arrival in March 2001 imposed particular time constraints on us, which called for a different approach to our standard inspection process.

2.13 This meant that we did not examine some areas usually covered by BFI inspections, such as verification quality. We did not sample new and renewal claims and overpayment cases.

2.14 Given the limited time available, our approach was geared more towards an assessment. Our methodology for this work was:

- analysis of standard data (including audit reports and policy documents)
- validation of the view that KUHCC gave us of its own assessment of performance
- on-site work, primarily interviews and workshops with some limited sampling of fraud cases.

2.15 In a full inspection we would have examined a wider range of subjects and gone to greater depth on the areas covered.

Making sure the strategy works

2.16 *Making sure the strategy works* means planning action, taking action and measuring the impact of that action to help plan future activity. We found that this aspect of the government's strategy needed particular attention in KUHCC.

Corporate support

2.17 It is important that efforts to root out fraud and error are supported by senior managers and members. We had little opportunity on this particular inspection to scrutinise these issues in depth. However, we did note that:

- there is no corporate anti-fraud and corruption strategy
- overpayment recovery is not reported to members
- counter fraud activity is not reported to members.

2.18 Counter fraud staff told us that their work was not sufficiently valued and that they felt marginalised.

KUHCC needs to put in place appropriate strategies for benefits and counter fraud work which are consistent with the government's strategies to combat fraud and error.

Performance management

2.19 The main theme of this report and a key concern for KUHCC is the management of performance. We found that management information that should be collected routinely was often not available (for example, the age of overpayment debt) or surrounded by uncertainty about its validity (for example, speed of processing and accuracy).

2.20 Part of the reason for this appears to be that KUHCC's IT systems are not designed to produce useful statistics. However, we also found different ways of keeping statistics and various methods of counting, with no single method to measure performance.

2.21 Even where problems are obvious there is little effective remedial action. The starkest example of this is in reviews, with a significant disparity between the numbers and ages of outstanding cases from team to team. Delays in processing reviews directly affect claimants.

2.22 Another weakness we identified was KUHCC's use of data to plan future activity. For example, KUHCC is not making use of the valuable data held in the fraud IT system to target its counter fraud activity more effectively.

2.23 Though some checking is done, we have reservations about the security and effectiveness of case selection and the extent to which results are used to raise standards. In practice, cases are not randomly selected and only completed determinations are chosen from manual lists prepared by benefit assessors.

2.24 We noted that many team leaders were very experienced and had developed individual and separate ways of working. This led to inconsistencies in how they manage their team's workload. This means KUHCC cannot be sure that all claimants receive consistent treatment. It also discourages sharing good practices.

2.25 The geographical separation of the various benefits units makes effective management more difficult. Different methods of working and separate and distinct cultures have developed within each of the operational offices.

2.26 The benefits manager told us that because of pressure of work he had limited contact with the RR sections, although there are regular meetings with team leaders. He does not have management responsibility for the public reception point, even though the work of staff there has a direct effect on his teams. The IAU works in the same building as the benefits manager but reports to a more senior officer in another building. We were told that there are now plans to relocate the IAU.

2.27 Effective management of the service is also impaired by other factors. For example, staff told us there have been quality problems with indexing which is carried out by a central post indexing team. Resolving these problems is complicated by the fact that another directorate manages the central post team and communication lines are not clear or effective.

2.28 All these management issues could be remedied by stronger direction from senior managers once they decide clearly what standards of service are required. Those standards should not vary from team to team and should aim to treat claimants equally. There should be one integrated service, with component parts working together to achieve agreed outcomes. Failure to meet standards should be addressed. Networks should be set up to address issues outside the control of benefits managers.

2.29 KUHCC had produced a draft proposal to re-structure the service to address problems and this was about to be put to members at the time of our on-site activity. Re-structuring could play a part in making improvements, but it is more important to pay attention to the sort of management issues listed in this section.

IT

2.30 KUHCC has a variety of IT problems, some of which are already documented in audit reports. KUHCC told us that the Housing Benefit Information System (HBIS) was regularly down, sometimes for several days. This has a major impact on workflow.

2.31 The HBIS system does not interface with Sundry Debtors and vital management information relating to overpayment recovery is not readily available.

2.32 The Document Image Processing (DIP) system is only being used to process RA cases. RR cases are still being processed manually in the Area Housing Offices. There is an increased risk of inconsistencies as a result of operating 2 different methods of processing.

2.33 A recent IA report is extremely critical of the way the DIP system was introduced and notes that this is in line with how other IT projects have been handled in KUHCC. It concludes that this particular part of the IT infrastructure has had little effect in improving processing performance. The DIP system was due to be re-launched while we were on site.

KUHCC should introduce consistent, co-ordinated methods of working which treat claimants equally and are supported by reliable management information.

Change management

2.34 We do not underestimate the size of the task KUHCC was faced with in April 2000 when merging 2 separate services. However, nearly a year later the 2 halves were still operating separately in most respects, with limited progress on resolving the practical difficulties the merger created.

2.35 We suggest that KUHCC carefully and thoroughly plan the completion of this merger. This should include the design and characteristics of the proposed new service and, crucially, the human resource management aspects. The latter can make the difference between a successful transition and a continuation of the current deficiencies.

KUHCC should plan the transition to an integrated service carefully and manage the change with particular attention to the human resource aspects.

Internal security and controls

2.36 Like most LAs, KUHCC relies on IT systems to deliver its benefit service. It is important that these are secure and that there are safeguards against internal fraud. However, KUHCC does not have a corporate IT security policy. Our concern about this is shared by District Audit (DA) in its Management Letter to KUHCC in December 2000.

2.37 Our interviews with assessors and team leaders on site, and the responses to an IT security questionnaire completed by the benefit control team leader, indicated that the benefits service has basic IT security controls. There are user passwords for all systems, with system generated password changes and individual transaction levels set according to grade and the individual's experience.

2.38 We were told that access permissions are reviewed by all team leaders over a period of time and that the IT support team carries out a regular trawl and checks against regular staffing lists provided by personnel. All requests to add or remove users have to be made in writing to the support team.

Internal Audit

2.43 IA can provide KUHCC with assurance that its systems and procedures are operating securely and as intended. Figure 2.1 shows the number of IA days spent on benefit administration and benefit fraud matters over the last 3 completed years.

Fig. 2.1: IA activity breakdown

	1997/98	1998/99	1999/2000
Total IA days allocated	163	151	146
Total number of IA days used	89.28	60.01	16.14
Number of IA days used on HB/CTB administration	78.00	60.01	16.14
Number of IA days used on counter fraud work	11.28	NIL	NIL

Source: KUHCC IA

2.44 This shows very little attention to benefits, and especially counter fraud work, over this period. This is of particular concern in view of the high proportion of KUHCC's gross revenue expenditure (20%) devoted to benefits.

2.45 IA told us that HB and CTB is seen as one of the 10 fundamental financial systems of the LA and should be audited annually. The depth of audit activity would depend on the perceived risk, which would be assessed by a point scoring methodology.

2.46 KUHCC has allocated a much higher number of days to this work in the current year. IA told us that of the 115 days spent on benefits so far, work on the IAU accounted for 20, work on the subsidy claim accounted for 17, but 38 (more than originally allocated to the task) had been spent on the DIP system.

External Audit

2.47 DA acts as external auditor for KUHCC. In November 2000 DA published its report *Countering HB Fraud* on KUHCC's approach to preventing, investigating and deterring HB fraud. This report drew attention to a number of areas for improvement similar to those we discovered. These include:

- the lack of performance targets
- reporting the work of the benefits service to members (especially counter fraud activity)
- bringing together existing written guidance
- attention to overpayment recovery
- better planning and direction for counter fraud work.

Findings

2.48 DA also noted that KUHCC has good practices, including the use of data matching.

2.49 KUHCC agreed with all of DA's recommendations and produced an action plan to take them forward. The target implementation date for most of them is 31 March 2001.

Getting it right

2.50 *Getting it right* means benefit payments should be correct from the start. This means that:

- there must be a secure gateway to the benefit system
- claimants should not have to deal with unnecessary red tape
- the organisation provides a modern, integrated, high quality service.

Benefit service accessibility and awareness

2.51 LAs can promote the legitimate take-up of benefit by:

- advertising the HB and CTB scheme through local media and throughout council offices
- working with other organisations, such as Benefits Agency (BA), welfare groups and landlords.

2.52 KUHCC has a social inclusion policy officer, who co-ordinates various council-wide projects. There is a welfare benefits strategy, which includes contacting council tenants once a year to check for potential entitlement.

2.53 We were told that there had been no concerted take-up campaigns for some years, but that there are some localised initiatives. At the time of our visit there were plans for a take-up campaign linked to a council rent rise from April 2001. This would involve using visiting officers to take claims from council tenants who became entitled to benefit as a result of the increase.

2.54 A customer satisfaction survey was undertaken in September 2000. The responses had not been formally analysed at the time of our visit. However, it was understood that customers were reasonably content with the service once staff dealt with their enquiry, but were unhappy about delays.

Claim form

2.55 We compared KUHCC's claim form with the attributes of a good claim form as specified in the BFI *Good Practice Guide*. We were told that KUHCC had designed the current form (introduced in October 2000) to reflect BFI guidance.

2.56 We found the form to be clear and, with 2 minor omissions, comprehensive. It is likely to assist in gathering enough information to support a claim. It includes examples of the kind of evidence needed, plus a checklist for the claimant to help ensure proper completion. The fact that KUHCC uses one form, rather than a variety, is good practice.

Verification work

Collecting and recording information and evidence

2.57 KUHCC has implemented VF, and became fully compliant from 5 February 2001. A VF project team of 4 people delivered training to staff and advice to interested groups outside the LA. Two training manuals were produced, one each for RA and RR. Both set out VF requirements satisfactorily.

2.58 Staff told us that verification visits to Category A (high-risk) cases had not yet been introduced, but would begin in March 2001, in accordance with VF requirements.

2.59 It was not clear to us that any officer in particular had responsibility for making sure that VF requirements were followed. KUHCC could either appoint a compliance officer or make VF compliance part of its checking regime for all team leaders.

KUHCC should ensure that the requirements of VF are followed in every respect, including frequency of visiting and asking for best evidence.

Verifying National Insurance numbers

2.60 Section 1(1A) and 1(2B) of the Social Security Administration Act 1992 requires that a claimant and any partner included in a claim should provide:

- a statement of their National Insurance number (NINO) and information or evidence establishing that that number has been allocated to them, or
- information or evidence enabling the NINO allocated to them to be ascertained.

2.61 Where a NINO is not held, the person should make an application for one and provide the information or evidence necessary for one to be allocated. We were told that staff had been trained to observe this requirement and that there was an officer whose duty it was to trace NINOs.

Verifying identity

2.62 There is a requirement for LAs to be satisfied that the claimant is who they say they are. This can be done from information and documentation provided by the claimant. The VF provides guidance on which documents can be used to ascertain identity but this should only be viewed as a minimum standard. KUHCC's instruction manual reflects the basic requirements of VF but KUHCC needs to ensure that the distinction between the best and other evidence is understood. For example, a passport and a medical card are not equally valid in proving identity because the process of obtaining a passport involves a much more rigorous test of identity. KUHCC should try to obtain this sort of best evidence where possible.

Verifying IS and JSA(IB) entitlement

2.63 The law requires that when the claimant receives Income Support (IS) or income-based Jobseeker's Allowance (JSA(IB)) the LA should disregard a claimant's income and capital. However, it is essential in all IS/JSA(IB) linked cases that the LA confirms that the claimant is actually receiving these benefits.

2.64 We were told that there were problems with the use of the remote access terminals (RATs) linked to BA. These were provided to LAs to allow quick and easy access to DSS benefits information. Staff told us that the RAT did not give them all the information they needed so resorted to ringing BA. However, BA staff are reluctant to help because that is what the RAT is for. There may be a training need for LA staff to improve the use of the RAT.

2.65 Staff dealing with RR claims do not have direct access to a RAT but fax requests to the RA office. Before VF, requests were returned promptly, but since VF requests can take up to 10 days to be returned. This delay is adding to avoidable delays in determining claims. XXXXXXXX
XX
XXXXXXXXXXXXXXXXXXXXXXXXXXXX.

2.66 KUHCC is only using one of its 2 RATs so is not making optimum use of the RAT service.

KUHCC should ensure that sufficient staff are trained in the use of the RAT, that both available RATs are operated, and that the service is prompt.

Rent Officer referrals

2.67 The law requires LAs to refer certain RA claims to the Rent Officer (RO) for a determination to be made on the level of rent eligible for HB.

2.68 There is a service level agreement (SLA) between the Rent Service (RS) and KUHCC. RS told us that it monitors its own performance to ensure that it meets its part of the SLA targets. KUHCC does not keep statistics or monitor its performance at present, but intends to do so under the proposed management structure.

2.69 We were told that there was an effective working relationship between KUHCC and RS. There have been exchange visits between LA and RS staff to promote a greater understanding of each other's jobs. The last exchange was about a year ago. Fraud awareness training was last provided at the request of RS in January 2001.

2.70 There are weaknesses in KUHCC's current handling of RO referrals. Processing backlogs mean cases are not referred as quickly as the law requires, within 3 working days of the claim, or as soon as practicable thereafter. RO determinations are not implemented promptly.

KUHCC should ensure that work involving RS is managed effectively. This includes:

- making prompt referrals
- monitoring performance against SLA targets
- keeping statistics and using them to effect improvements where possible
- ensuring referrals are made in all appropriate cases, including HA cases where appropriate.

Checking assessment quality

2.71 The Audit Commission (AC), in its publication *Countering Benefit Fraud – A Management Handbook*, recommends that LAs quality check at least 10% of claims. Checks should cover all activities, including new claims, renewal claims and changes of circumstances. Checks can be used to gauge performance standards, identify training needs and help guard against internal fraud. The types of checks recommended by BFI are listed in the BFI's *Good Practice Guide*.

2.72 We found that KUHCC is drawing its 10% sample for checking from manual records kept by assessors of cases determined. This means that cases that are not yet determined are not checked. XXXXXXXXXXXXXXX
XX
XX
XX
XXXX

2.73 We were told that only errors affecting the amount of benefit in payment were communicated upwards to managers. Other points are fed back to individuals and their line managers. The system KUHCC uses means that an assessor's work can be checked by a number of different people, which will tend to be less effective than if just one or 2 checkers were involved.

2.74 It is good practice to collate the information from checking to provide a picture of quality standards and to identify training or other needs. KUHCC does not do this.

2.75 KUHCC is not making best use of its opportunities for checking the quality and accuracy of work. Any accuracy figures produced by the current system must be treated with caution because of the selection methods.

KUHCC should ensure that cases for checking are selected securely from all possible cases and cover all activities. Checkers' findings should be recorded and analysed so that trends, training and management needs can be identified for action.

Speed of processing

2.76 The law requires that claims must be determined within 14 days of the relevant information having been received, or as soon as is reasonably practicable thereafter.

2.77 We found it difficult to assess KUHCC's performance against this requirement because of the limited and unreliable information. The service delivery plan for the year 2000/2001 has no performance data. Other information was inconsistent and raised doubts about its accuracy. For example, KUHCC reported that in October 2000 new claims for RA were taking an average of 41 days to clear, while other figures for the same period said that 82% of such claims were being cleared within 14 days. It is unlikely that both could be correct. We noted that the benefits manager had 2 sets of statistics because of the difficulty of obtaining one reliable set from the IT system.

2.78 We were also told that, on some teams, once a claim had gone beyond its 14 day target, attention would shift to clearing newer cases so that at least those would be processed within the target time. Although this might improve performance figures, it is clearly not a fair way of dealing with claims.

2.79 Documents can be delayed in transit between where they are received and the assessment section. For example, we were told that a piece of post recently took 9 days from receipt to reaching the assessment team, and that in one office the practice was to wait for the transit envelope to be full before sending it. There are no target times covering the speed with which documents should be forwarded. As documents might be handed in at a number of offices across the city, it is essential that there is an effective system for sending them to the assessment teams promptly.

2.80 The time taken to obtain RAT details also contributes to delays.

2.81 KUHCC also has a backlog of work, particularly on the RA unit. The lack of reliable data made it difficult for us to work out the outstanding work position, but staff told us that they have approximately 8 weeks RA work outstanding. Staff who attended our workshop indicated that the Area Housing Offices, which deal with RR cases, were relatively up to date.

KUHCC should analyse where delays are occurring and take action to minimise them. For example, KUHCC should ensure, using targets and management checks, that claim documents are passed to assessment teams promptly.

KUHCC needs to develop a reliable method of producing accurate statistics to inform performance management.

Payments on account

2.82 The law requires LAs to make a payment on account (POA) where they are unable to determine a RA claim within 14 days, and the inability has not arisen out of the claimant's failure to provide the necessary information to determine the claim. This is an important safeguard for claimants when, as in KUHCC, there are backlogs of claims.

2.83 Staff told us that they knew what POAs were and made payments when appropriate. However, we found no evidence of managers checking that POAs were made when they should be, so KUHCC cannot be sure that proper action is being taken.

KUHCC should use training, guidance and management checking to make sure that POAs are made in all appropriate cases.

Liaison with BA and ES

2.84 KUHCC's ability to administer HB and CTB claims effectively and efficiently depends on good working relationships with BA and ES. This is because many HB/CTB claims are linked to IS/JSA(IB) entitlement and many other claims involve other BA benefits.

2.85 SLAs should be used to manage and monitor liaison arrangements and BA has set down a national model containing national performance standards.

2.86 We found that there is a combined SLA between BA, ES, KUHCC and the East Riding of Yorkshire. There are quarterly meetings and, by agreement, monitoring is carried out by BA. KUHCC itself carries out no monitoring at present and relies on BA to identify issues.

2.87 KUHCC and BA both told us that relations were good, with no areas of concern other than the RAT problem that was discussed at a recent meeting.

KUHCC should do its own monitoring of the SLA with BA and ES, to identify and improve areas of weakness.

Keeping it right

2.88 *Keeping it right* means making sure that payments are adjusted as circumstances change. This builds on the work done to keep the gateway to benefit secure and makes sure that there are effective safeguards to keep payments right.

Renewal claims

2.89 We have already commented on KUHCC's performance on claim verification and processing. In this section we comment on matters that are only relevant to renewal claims.

2.90 KUHCC told us that renewal claim forms are issued 10 weeks before the claim period ends. However this does not comply with Reg 72(14) which requires that the LA sends the claimant an invitation to make a further application for benefit not more than 8 weeks before the end of the benefit period. There is no universal policy to pursue failed renewals but we were told that some RR offices arrange visits to safeguard the rent account position.

2.91 KUHCC should bear in mind that a failed renewal could mean that there is a welfare issue, but also that it could indicate a fraudulent claim. It is improbable that a claimant will cease to be entitled at exactly the same time as their benefit award ends, especially if standard periods are set. A failed renewal should raise the question of whether there was undeclared change of circumstances, perhaps affecting income or capital, on the previous claim.

2.92 KUHCC told us the flow of renewal claims tends to be uneven, with major influxes a few times a year, and little during the weeks in between. This pattern, when taken with a chronic backlog situation, makes effective prioritisation more difficult and could lead to breaks in payment.

KUHCC should make sure that its renewal timetable complies with Reg 72(14) and forms are not issued more than 8 weeks before the benefit end date.

KUHCC should pursue all failed renewals to make sure that benefit is kept right at all times.

KUHCC should consider how the flow of renewal claims can be managed (subject to legal requirements) to avoid peaks and troughs.

Notices of determination

2.93 Schedule 6 to the HB Regulations specifies the information that LAs must include in notices of determinations. There are similar provisions for CTB.

2.94 Notices of determination play an important part in helping to keep claims right. Amongst other things, they provide important entitlement information and tell recipients of their responsibility to report changes in circumstances.

2.95 We examined KUHCC's notices of determination and found some deficiencies. They advise claimants of appeal rights, but not of the right to a written statement of reasons for the determination. They remind claimants to report changes of circumstances but do not provide a list of such changes.

2.96 These deficiencies could be easily put right and would tighten defences against fraud and error.

KUHCC must revise its notices of determination to ensure full compliance with the law.

Risk assessing claims

2.97 It is important that LAs use risk management methods to help minimise the occurrence of fraud and error following the initial award of benefit.

2.98 We found that KUHCC uses the risk categories prescribed by VF. The categories are assigned by the IT system, but a manual override is possible. We were told that checkers look to see if the categories are correct. However, these results are not collated to give an indication of quality and to aid training.

Benefit periods

2.99 The law requires HB and CTB awards to be for a fixed period, which must not exceed, when originally determined, 60 weeks. It also requires LAs to consider a claimant's individual circumstances when deciding on the length of any award. VF gives guidance on the length of benefit periods to be allocated to claimants in different risk groups.

2.100 We were told that all claims are automatically allocated a 26 or 52-week period except for cases referred to the RO on changes of circumstances. The variable approach required by the law is therefore not applied. Instead, KUHCC uses a diary system to identify potential changes of circumstances that may occur during the course of the standard period set.

2.101 This method relies on manual intervention so is open to error. But the real problem is that it is not as secure as tailoring periods to individual circumstances. If that is done, benefit will cease if the claimant does not renew the claim.

2.109 From April 2001 KUHCC will be using the Bank Automated Clearing System (BACS) method for directly paid landlords. Although this method has advantages of cost and ease of use, it can give rise to additional risk of non-residency fraud. Intelligence gathered from its counter fraud work about non-residency could help KUHCC to assure itself that this risk is minimised. KUHCC's own data shows that 23% of the cases recorded as proven frauds in 2000 concerned residency (see *Putting It Right*).

KUHCC should visit a proportion of claimants receiving crossed giro and BACS payments to detect and prevent non-residency fraud and error.

Liaison with landlords

2.110 The BFI *Good Practice Guide* lists the risks of not communicating effectively with landlords.

2.111 KUHCC pays £28.2 million direct to landlords of which £10.9 million is paid to HAs.

2.112 KUHCC checks that a landlord owns the relevant property, but does not ensure that the landlord is a fit and proper person to receive direct payments, as the law requires. This leaves doubt about the security of these payments.

2.113 Liaison with landlords was uneven. There is no landlord information pack, although KUHCC told us one was being produced. There are meetings with landlords at which the main topic is inevitably delays and complaints.

2.114 KUHCC has fostered good relations with Housing Associations (HAs), establishing a team dealing solely with them. This team is proactive, uses electronic mail to communicate with HAs and keeps in touch with the claimant or HA.

2.115 We were told that historically other landlords have been kept at arms' length. However, it is now intended that a more customer-focused approach will be adopted towards tenants of 2 of the larger private landlords. This would include seeing their tenants by appointment. If this goes well, KUHCC will consider extending this style of service to other tenants. Until this happens there is disparity of treatment.

KUHCC must, before making direct payments to landlords, ensure that the "fit and proper person" test is applied.

KUHCC should ensure that it provides an equally good level of service to all claimants whatever their tenure type.

Reviews

2.116 In KUHCC individual teams handle requests for review. KUHCC is considering plans for a different arrangement in future, under which a quality and service development group would handle reviews.

2.117 Whilst on site we obtained statistics on outstanding requests for review. These showed that the RA teams had over 400 cases between them, with the oldest request made in May 2000. By contrast, the RR teams had 24 cases, with the oldest received in October 2000.

2.118 We also noted that there were 29 cases concerning overpayments where review board action was outstanding, of which the oldest case was received in June 1999.

2.119 Delays and arrears of this size need to be addressed urgently, and the disparity in performance between the RA and RR sides should be analysed and rectified.

KUHCC should ensure that outstanding requests for review are actioned promptly at all stages. KUHCC should introduce a management check aimed at achieving this.

Training and guidance

2.120 There are several documents containing guidance for benefits processing staff, but no single authoritative source and no apparent mechanism for achieving one and keeping it up to date.

2.121 We found a varied approach to training and guidance in KUHCC, with more attention given to the needs of new staff than those of existing staff.

2.122 From April 2000 KUHCC established a training operation covering the RR and RA teams. This has meant a more structured approach to training than previously. Induction packs are issued. Updates to the law are notified by memos and discussed at team meetings. We were told that, despite this, varying interpretations were held on the teams, with no single agreed view prevailing.

2.123 KUHCC shuts its offices for an hour each week for training and discussion of new developments.

2.124 Staff told us that individual training needs were identified at achievement and development reviews, due every 6 months but not always done. Some staff had been waiting over a year for training on overpayments and extended payments. Training is not consistent across the teams; new staff are assigned to a mentor on some teams, but not on others.

KUHCC should introduce a comprehensive, accurate and consistent set of guidance for staff, and make sure that it is kept up to date.

Findings

KUHCC should ensure that it has a consistent and comprehensive approach to training, building on the best features of its current variety of arrangements. KUHCC should undertake a training needs analysis and make sure that it includes any needs arising from its organisational restructuring.

Putting it right

2.125 *Putting it right* means detecting when payments go wrong and taking prompt action to correct them with appropriate penalties to deter a recurrence. It is vital that fraud or error is detected as soon as possible to keep overpayments to a minimum.

Overpayments

Policy

2.126 LAs should aim to prevent overpayments from occurring in the first place, but when they do occur, LAs should be able to:

- identify them promptly
- classify them correctly
- determine whether they are recoverable
- pursue recovery by the most speedy, cost effective and efficient methods available.

2.127 Rigorous recovery of overpayments can have a significant deterrent effect on fraud, delivering the message that crime does not pay.

2.128 We noted an overpayment policy which had been drawn up in October 2000 but not yet put to members for approval. This policy has the right ingredients, for example stating that all available methods of recovery will be used.

Management

2.129 We found a variety of deficiencies in the way KUHCC managed its HB/CTB overpayments work. These included:

- no readily available management data
- processes inconsistent between RA and RR cases
- different rates of recovery – for RR overpayments recovery is being made at only £2.50 a week, but for RA the rates are £7.95 for a standard case and £10.40 for a fraud overpayment
- no targets set for recovery
- checks begun only recently
- results of checks not analysed for training and feedback
- problems with IT systems.

2.130 On the basis of its existing information, KUHCC is unable to say with any accuracy:

- how much debt is outstanding
- the age of the debt
- how effective it is in recovering debt
- which methods are most effective.

2.131 For the record, we were told that KUHCC has approximately £1 million outstanding debt at present.

2.132 Both IA and DA have reported the problems that exist with the interface between the HBIS computer system and the sundry debtor and rent system.

2.133 In its *Countering HB Fraud* report published November 2000, DA recommended that KUHCC should set targets for the proportion of benefit to recover, including a target for recovering fraudulent overpayments. DA also recommended that the overpayment recovery officer should monitor results and report these to recovery staff and members regularly. These recommendations have not yet been implemented.

2.134 KUHCC has recognised that its overpayments work needs a major review. We saw this acknowledged in a draft paper to members, with a proposal for combining the various components of the current system to achieve a consistent and effective approach. It is also proposed that a new IT system be purchased to work with HBIS.

KUHCC should review its current overpayments procedures and ensure that a new approach is introduced to give assurance that overpayments are identified, classified and (where appropriate) recovered effectively. This approach should use consistency of treatment for all claimants.

KUHCC should ensure that it collects, analyses, reports and uses accurate information designed to help manage overpayments performance effectively.

Fraud

Managing investigations and investigators

2.135 BFI's *Good Practice Guide* states it is important to manage fraud investigations to:

- focus resources on the reduction of fraud
- identify and rectify investigative and administrative weaknesses
- provide assurance to management and members of the integrity and quality of investigations
- identify training needs.

2.136 DA reported in November 2000 that the IAU did not have an annual plan. It recommended that a plan be developed to provide the unit with overall direction in terms of the relative priority to be given to reactive and proactive investigations.

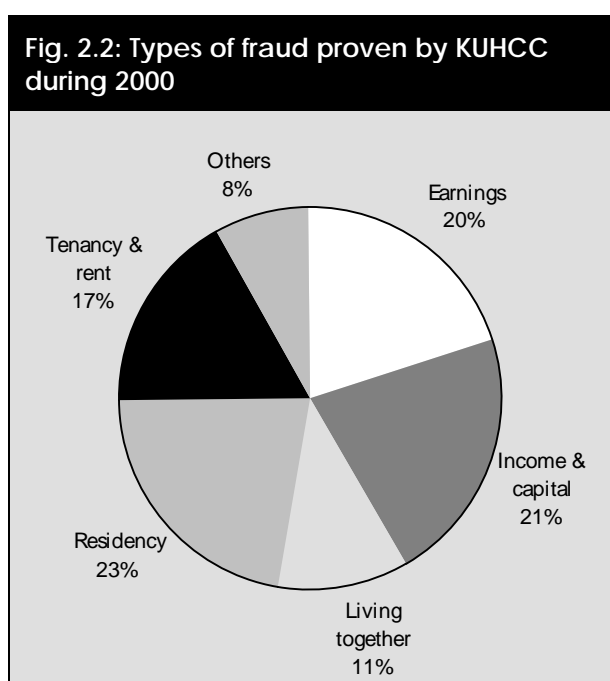
2.137 A unit business plan had been produced as recommended. It lists areas of work to be covered but does not make clear the IAU's business objectives, the standards to be achieved and how success was measured.

Analysing risk

2.138 To help ensure counter fraud effort is correctly focused and to ensure weaknesses in both benefit administration and investigation are identified, LAs should collect and analyse information on:

- the number and types of frauds investigated
- referral sources
- the characteristics of fraudsters and their benefit claims
- the success rates associated with the different combinations.

2.139 We found that little use was made of the data available from KUHCC's systems. We show in the next few paragraphs examples of the sort of analysis KUHCC could do.



Source: KUHCC Incase data

Established fraud

2.140 We analysed, from KUHCC's IT system 'Incase', the types of fraud established by KUHCC in 313 concluded investigations. Our findings are in Figure 2.2.

2.141 These investigations were derived from 499 fraud referrals, of which 311 were generated by assessment staff processing RA cases.

2.142 The same staff generated the referrals that resulted in 52 of the 54 proven fraud investigations involving fictitious tenancy and rents. This type of investigation proved most rewarding for KUHCC since it achieved 54 proven investigations from 242 referrals. This represents a 22.3% success rate.

2.143 Over a third of the 67 investigations involving income and capital fraud were raised in response to data matches received from HBMS, with a further 19 investigations raised by the IAU

during proactive exercises.

Gone away

2.144 During the year 2000 KUHCC's IAU concluded 1,890 investigations. Examination of data recorded on its fraud management system about these investigations revealed that only 4 had been recorded as gone away investigations. This figure is low because KUHCC will only take forward 'gone away' cases which can be fully proven, claiming 100% weekly benefit savings (WBS).

2.145 BFI's *Good Practice Guide* notes the important part good quality referrals have to play in the detection of benefit fraud.

2.146 Figure 2.3 shows the number of referrals received by the IAU over the last 2 completed years.

Fig. 2.3: Source of KUHCC referrals 1998/99 to 1999/2000

Source	1998/1999	1999/2000
Benefit staff	2,061	1,739
Fraud staff (inc proactive fraud drives)	102	60
Other LA staff	144	106
Data-matching	410	382
Fraud Hotline	340	279
Specific initiatives	628	223
BA BFIS	30	17
Other external sources (inc landlords and police)	0	0
Total	3,715	2,806

Source: KUHCC Incase data

2.147 The table shows that the number of referrals received by the IAU in total, and from every listed source, has fallen over the last 2 years. We were told that this was attributed to a number of factors including the lack of a programme of regular fraud awareness training and the introduction of the new IT system which the RA staff must use to make referrals. We were also told that this training was not mandatory even when delivered.

2.148 KUHCC's fraud data for the year 2000 showed 3,174 referrals received. Our analysis of the source of these referrals is in Figure 2.4.

Fig. 2.4: KUHCC's fraud referrals by source 4/1/2000 – 28/12/2000

Referral source	Number	Percentage of total
Assessment staff (RA)	1048	33
Assessment staff (RR)	630	19.8
Forms QB64/65	610	19.2
HBMS	363	11.4
Public	249	7.8
Proactive exercises	174	5.5
Fraud section	52	1.6
Council tax section	15	0.5
Miscellaneous	15	0.5
BA BFIS	14	0.4
Other LAs	4	0.1
Totals	3,174	100

Source: KUHCC Incase data

2.149 This shows that benefit assessment staff, as might be expected, generated half of the total referrals received. But of these a far greater proportion concerned RA than RR cases. We were told that this imbalance was likely to be because fraud staff occupied the same building as RA staff and were therefore more accessible. This suggests that more RR referrals would be made if fraud staff were more accessible.

KUHCC should introduce a programme of mandatory fraud awareness training (at least once a year) for all benefits staff and other officers likely to have contact with claimants.

KUHCC should regularly analyse its referrals data for trends and inconsistencies and take action to ensure that fraud referrals are numerous and of good quality.

Proactive work

2.150 Proactive anti-fraud work can help improve the security of the benefits system by:

- finding fraud that might otherwise have not been detected
- deterring potential fraudsters from attempting to defraud the benefit system.

2.151 KUHCC has a dedicated officer working in liaison with BA on their 'Closer Working' initiative. Unfortunately this work has lapsed recently due to the high turn over of IAU staff and the sizeable training commitment. However, it was intended that the fraud teams would reorganise so that resources would be specifically allocated to this work in future.

Data matching

2.152 KUHCC sends its benefits data to HBMS and has had some success in pursuing the subsequent referrals. KUHCC records show that in 3 years overpayments amounting to nearly £0.5 million pounds have been detected in this way. Over the same period, WBS of over £300,000 have been recorded.

2.153 KUHCC had 150 HBMS referrals outstanding (received in November 2000) at the time of our inspection.

2.154 KUHCC has matched its payroll and students data with benefits data. We were told that this had produced some positive matches in the past but had not been done in the year 2000 because of fears about "Y2K", nor had this been done by any other LA.

Fraud hotline

2.155 Encouraging referrals from the public by means of a fraud hotline can provide a rich source for fraud investigation activity. In addition, publicity associated with it can bring the seriousness of benefit fraud to the attention of taxpayers and increase public awareness of fraud.

2.156 KUHCC subscribes to the national "Fraudwatch" hotline. The cost for 1999/2000 was £1,200 subscription and £2,086 advertising. KUHCC's Incase data showed that it received 144 referrals from this source during the year 2000. Of these, only 2 resulted in fraud being proven. KUHCC could not explain this apparently disappointing result.

KUHCC should review the value of its current hotline arrangement and consider sharing the costs of operating and publicising a local hotline with neighbouring authorities.

Using inspectors' powers

2.157 Sections 110A and 110B of the Social Security Administration Act 1992 provide for the LA to appoint inspectors. Appointed inspectors have statutorily defined powers:

- to enter business premises to inspect them, with other people if necessary
- to make enquiries about and examine documents relating to a person believed to be a claimant or in receipt of HB or CTB
- to interview a person on premises inspected or who is believed to have information or documents about a claimant or recipient of HB or CTB.

2.158 The relevant legislation is quoted in all correspondence with employers and certificates are taken and produced on all visits. Up to now, KUHCC has never had to use the powers to gain access to information. The IAU manager has identified that he and the team leaders are not the appropriate holders for the warrants. All the Investigation Officers will be appointed Inspectors after receiving the appropriate training.

Quality of investigations

2.159 To help us comment on the quality of KUHCC's investigation work, we examined the files for 25 cases accepted for investigation. We found that:

- 5 should not have been accepted for investigation
- in 3, no benefit was in payment
- in 13, potentially useful lines of enquiry were not pursued
- in 11 out of 17 where a statement should have been obtained, it was not
- in 3, interviews under caution should have been undertaken.

2.160 This was a small sample, and therefore caution is needed in assessing quality. But our view is that the quality of fraud work overall needs improvement. There was no evidence on 24 of the files that there had been any management check or intervention. Unnecessary delays occurred in 16 cases. Although 100% of proven cases are checked, KUHCC needs a system of checks and interventions at specified points throughout the life of a case.

Sanctions

Cautions

2.161 KUHCC records show that 6 cautions were administered in 1999/2000 and 3 in the previous year.

Administrative penalties

2.162 KUHCC records show that 3 administrative penalties were offered in 1999/2000, with 2 in the previous year. This shows that in those cases the investigation achieved the standards required to support successful criminal proceedings.

Prosecutions

2.163 KUHCC has prosecuted benefit fraudsters since 1996 when the IAU was set up. Since 1996/97 the number of cases referred for prosecution has more than doubled. Details are in Figure 2.5.

Fig. 2.5: Number of prosecutions

Year	Prosecutions started	Successful prosecutions
1997/98	19	19
1998/99	25	20
1999/2000	29	19

Source: KUHCC

2.164 This shows that although the number of prosecutions initiated by KUHCC has risen over 3 years, the number of successful prosecutions has not. However, 1999/2000 may well result in more successful prosecutions given that 10 prosecutions are still ongoing.

2.165 In its *Countering HB Fraud* report published in November 2000, DA commented that referred prosecution cases had not been dealt with due to long-term sickness in the legal department. KUHCC's action plan indicates that DA's recommendation that these cases be referred to court before September 2000 has been actioned.

Management checks

2.166 DA reported that the organisational structure of the IAU allows for 2 levels of internal check on investigations, 100% by team leaders and 10% by the IAU manager.

2.167 In its January 1998 review and again in August 2000, IA noted that the IAU manager was not reviewing investigation files and recommended that a sample of files should be regularly reviewed to check that appropriate actions and decisions are being made.

2.168 The absence of any management checks by the IAU manager over a prolonged period means that KUHCC has limited assurance on the quality of its investigations or the techniques of its investigators. A system of checks performed by the team leaders was introduced in January 2001, but the criteria and time at which the check is performed will not provide the required assurance of quality, accuracy and integrity of the investigation. KUHCC should review these checks.

KUHCC should ensure that regular management checks are done on investigation files. These should address:

- **if all lines of enquiry are being pursued**
- **unnecessary delays**
- **the quality of investigation**
- **legal requirements**
- **whether unpromising cases should be closed.**

Training and guidance

2.169 KUHCC has produced local guidance which we were told was about to be updated. The IAU does not use the DSS manual the *Fraud Investigators Guide*.

2.170 There has been a good deal of recent training activity in the IAU. The team leaders have undergone Professionalism In Security training, and it is intended that the rest of the staff also receive this training. The manager plans to take the Professionalism In Security manager course.

2.171 We were told that assessment training had been requested but had not yet been arranged.

Abbreviations

All abbreviations used in this report are written in full when they are first used. For easy reference the more commonly used abbreviations are listed below.

AC	Audit Commission
BA	Benefits Agency
BACS	Bank Automated Clearing System
BFI	Benefit Fraud Inspectorate
BFIS	Benefit Fraud Investigation Service
CTB	Council Tax Benefit
CTB Regulations	Council Tax Benefit (General) Regulations 1992
DA	District Audit
DIP	Document Image Processing
DSS	Department of Social Security
ES	Employment Service
FC	Family Credit
HA	Housing Association
HB	Housing Benefit
HBIS	Housing Benefit Information System
HBMS	Housing Benefit Matching Service
HB Regulations	Housing Benefit (General) Regulations 1987
IA	Internal Audit
IAU	Investigation and Advice Unit
IS	Income Support
JSA	Jobseeker's Allowance
JSA(IB)	Income-based Jobseeker's Allowance
KUHCC	Kingston upon Hull City Council
LA	Local Authority

Abbreviations

NINO	National Insurance number
POA	Payment On Account
RA	Rent Allowance
RAT	Remote Access Terminal
RO	Rent Officer
RR	Rent Rebate
RS	Rent Service
SLA	Service Level Agreement
VF	Verification Framework
WBS	Weekly Benefit Savings
WFTC	Working Families' Tax Credit

