

WREXHAM COUNTY BOROUGH COUNCIL

BENEFIT FRAUD SANCTIONS POLICY

1. PURPOSES & OBJECTIVES

- 1.1. This document sets out the Council's policy for applying sanctions to persons and organisations external to the Council who commit Benefit fraud against it.
- 1.2. The Policy is made accordance with the Council's 'Anti-Fraud and Corruption Strategy' which states "**The Council will seek to prosecute or apply other appropriate sanctions to perpetrators of benefit fraud and corruption**" (see Appendix A).
- 1.3. **It should be understood that the Council (all elected members and any employees or agents working for it) fully supports this Policy and will seek to implement it, and that any persons or organisations who commits Benefit fraud against the Council can expect to be sanctioned accordingly.**
- 1.4. In recognition of the Council's strategic aims and its status as a responsible steward of public funds, and also in view of public concern at fraud, especially the national problem of benefit fraud, this Policy aims to enable fraud to be effectively countered and deterred. Its specific objectives are to:
 - ensure that fraud is punished through effective sanctions,
 - assist in the selection of the most appropriate sanction,
 - ensure that sanctions are successfully applied,
 - maximise the deterrent effect of successful sanctions,
 - help obtain adequate recompense where necessary,
 - maintain and generate public confidence in and respect for the Council, by helping to ensure that justice is seen as being done.

2. SCOPE AND DEFINITIONS

- 2.1. **For the purposes of this Policy, fraud means: 'the intentional distortion of financial statements or records by any persons which is carried out to conceal assets or otherwise for gain'.**
- 2.2. This meaning also includes **making financial gain, or an attempt to make financial gain, by knowingly failing to advise of changes to information previously supplied.**
- 2.3. This Policy covers only Housing Benefits and Council Tax Benefit fraud against the Council by external persons or organisations. This may include, amongst others:
 - Benefits claimants
 - Landlords
 - Agents
- 2.4. This Policy sets out:

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- the sanctions which are available,
- the criteria for deciding which sanction to apply,
- the responsibilities for deciding which sanction to apply,
- the responsibilities in respect of each sanction,
- the investigation of cases in relation to this Policy,
- publicity and reporting,
- keeping the Policy timely and relevant.

3. SANCTIONS AVAILABLE

There are four sanctions available:

- 3.1. **Prosecution:-** Criminal proceedings may be brought against alleged offenders and the case heard in Court with a view to obtaining a criminal conviction and an appropriate sentence.
- 3.2. **Formal Caution:-** An oral warning may be given in certain circumstances to a person who has committed an offence.
- 3.3. **Administrative Penalties:-** In accordance with Social Security legislation¹, Administrative Penalties will be considered as an alternative to prosecution in Housing / Council Tax Benefit fraud cases. A financial penalty amounting to a statutorily determined percentage of the gross adjudicated overpayment can be offered to a person where there is enough evidence to prosecute.
- 3.4. **Overpayment Recovery and Civil Court Action:-** A strict requirement to repay monies fraudulently obtained is in itself another major deterrent to fraud, and may be additional to any other sanctions that are applied. Recovery may also include Civil Court action.

4. CRITERIA FOR DECIDING WHICH SANCTION TO APPLY:

4.1. OVERALL

4.1.1. The sanction selected will take account of:

- the amount of the fraud,
- its duration,
- whether the offender has a history of fraud (if known),
- the offender's personal and social circumstances,
- the extent to which the fraud was deliberate,
- the public interest,
- the quality and suitability of evidence.

¹ Section 115A of the Social Security Administration Act 1992 as inserted by section 15 of the Social Security Administration (Fraud) Act 1997 and the Social Security (Penalty Notice) Regulations 1997

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- 4.1.2. It must be understood that **all frauds will be treated rigorously and prosecution will be regarded as the optimum sanction.** The Council reserves the right to seek to prosecute in every fraud case.
- 4.1.3. Where another agency is involved, such as the Department for Work and Pensions, then this may influence which sanction to apply (for example, where the *total* value of the fraud is significantly greater than the Council's element). The Council has an agreement for joint investigations with the Benefits Agency in cases where their claimants are also claiming Housing /Council Tax Benefit from the Council.
- 4.1.4. In Benefit fraud cases, account will be taken of the extant guidance of the Department for Work and Pensions (Appendix B) as to the recommended sanction.
- 4.1.5. Previous conviction for fraud is an important factor, and where legally possible, checks will be made with the relevant official agencies. In joint investigations, such as those with the Department for Work and Pensions, then the partner agency may be better placed to make this check. The Council will check against its own internal records wherever possible.

4.2. CRITERIA FOR DECIDING WHICH SANCTION: PROSECUTION

- 4.2.1. Prosecution is a serious measure, which can have significant implications for those involved, and must be undertaken fairly and effectively for law and order to be maintained. Decisions to prosecute must therefore be fair and consistent.
- 4.2.2. Account must also be taken of the resources required for prosecution which can be considerable.
- 4.2.3. Suspected cases of fraud and corruption will not automatically be subjected to prosecution but decisions will take account of the **public interest** and whether there is **sufficient evidence**. The decision criteria will be influenced by the Attorney General's guidance, the Code for Crown Prosecutors, and any other official guidance.

The Public Interest Test

- 4.2.4. Prosecution will be considered **more** likely if at least one of the following applies:
- a significant sentence is likely as a result of conviction,
 - the offence was premeditated, calculated and / or deliberate,
 - the defendant was a 'ringleader' or organiser of an offence,
 - the defendant has relevant previous convictions.
 - the alleged offence was made by a group,
- 4.2.5. Prosecution will be considered **less** likely if:

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- only a small or nominal penalty is likely,
- the offence was committed as a result of a genuine mistake,
- the initial loss to the Council was minor,
- there has been a long delay between the offence and the trial (unless the offence is serious, it has only recently been discovered, its complexity has involved a lengthy investigation, or the delay has been caused by the defendant),
- the defendant is elderly and/or suffering from significant physical or mental ill - health, or was in a particularly stressful situation at the time of the offence,
- details could be made public that could harm another individual.

4.2.6. The above lists are not exclusive, and there may be other factors to be considered.

4.2.7. Only where unfavourable factors outweigh the benefits will a prosecution not be brought, subject to the **evidential test** (below).

The Evidential Test

4.2.8. There must be satisfaction that there is sufficient evidence to provide a realistic prospect of conviction on each charge. The likely defence case should be considered and how that is likely to affect the prosecution case.

4.2.9. A realistic prospect of conviction is an objective test, and means that a magistrates' bench or jury, properly directed in accordance with the law, is more likely than not to convict the defendant of the alleged charge.

4.2.10. When deciding whether there is sufficient evidence to prosecute, consideration must be given to the admissibility and reliability of the evidence. In many cases the evidence will give no cause for concern, but there will also be cases where the evidence may not be as strong as first appears. It must therefore be considered whether:

- *the evidence can be used in Court* - there are certain legal rules which might mean that seemingly relevant evidence cannot be given at a trial, examples being where evidence being excluded due to the way it was gathered or the rule against using hearsay as evidence,
- *the evidence is of sufficient extent* - if some evidence is to be excluded, then there must be enough other evidence for there to be a realistic prospect of conviction,
- *the evidence is reliable* - the reliability of a confession could depend upon the **defendant's** age, intelligence or lack of understanding; the reliability of a **witness's** evidence could depend upon factors concerning their background,

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such as any dubious motives they may have that could affect their attitude to the case; and if there is a question regarding the identity of the defendant, then the evidence's strength must be considered.

4.2.11. Each item of evidence will require testing for reliability and admissibility.

4.3. CRITERIA FOR DECIDING WHICH SANCTION: FORMAL CAUTIONS

4.3.1. Formal Cautions are a serious measure and must be handled as formally as any other sanction. The quality of evidence that is needed must therefore be of the same standard as that required for prosecutions.

4.3.2. There must be grounds for criminal proceedings, but it may be that prosecution is not the most expedient action. **The caution, however, cannot be offered as an alternative where it is considered that a prosecution would be unlikely to succeed;** there must still be sufficient evidence to justify court action.

4.3.3. The main value of Cautions as a deterrent is that if the person is subsequently prosecuted for further offence, then the caution may be cited in Court.

4.3.4. This sanction can only be considered where:

- there is sufficient evidence to justify instituting criminal proceedings,
- the person has admitted the offence during an interview-under-caution conducted in accordance with the requirements of the Police and Criminal Evidence Act 1984,
- the person's history of previous convictions, obtained from the appropriate agencies, has been taken into account,
- there is a reasonable expectation that this will curb his/her offending,
- the offender is over 18 years of age.

4.3.5. If the person declines to accept a Caution, then the alternative course of action will be criminal proceedings.

4.3.6. Only in very exceptional circumstances should subsequent Cautions be considered.

4.3.7. If, after having rejected the offer of a Caution, the person to whom it was offered changes their mind, then the Revenues Manager may agree to a new offer subject to what stage the prosecution is at.

4.4. CRITERIA FOR DECIDING WHICH SANCTION: ADMINISTRATIVE PENALTIES

4.4.1. This sanction can only be used where the overpaid Housing/Council Tax Benefit is recoverable, where it was attributable to an act or omission on the part of the person concerned.

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4.4.2. There must be grounds for criminal proceedings, but it may be that prosecution is not the most expedient action. **The penalty, however, cannot be offered as an alternative where it is considered that a prosecution would be unlikely to succeed;** there must still be sufficient evidence to justify court action.

4.4.3. Administrative Penalties have no standing in court proceedings and cannot be mentioned in Court, unless an offer been previously declined by the offender.

4.4.4. The penalty can only be at the rate specified by legislation. They are permissive and cannot be imposed, the offender being under no obligation to accept the penalty. After acceptance of the offer, the claimant is allowed 28 days in which to change their mind.

4.4.5. If the offender agrees to pay the Administrative Penalty, proceedings cannot be taken against them in respect of the offence that led to the overpayment on which the penalty is based, unless the agreement is withdrawn during the 28 days allowed for this purpose.

4.4.6. The offender has no right of review against the Council's decision to offer or not to offer a penalty.

4.4.7. This may be the preferred sanction:

- for first time or relatively minor frauds in terms of amount and duration,
- where there is a good chance of the fraudulent overpayment being recovered,
- when the offence is not admitted during the interview under caution..

4.5. **CRITERIA FOR DECIDING WHICH SANCTION: OVERPAYMENT RECOVERY AND CIVIL COURT ACTION**

4.5.1. Provided that criminal proceedings or other sanctions have been deemed inappropriate in accordance with this Policy, then recovery through the Council's Debtors system or from ongoing entitlement will be made.

4.5.2. Civil Court Action may also be considered as a means of recovering any amounts deemed to be lost due to fraud or corruption. Such action shall be conducted under arrangements approved by the Chief Legal and Administration Officer.

5. **RESPONSIBILITY FOR DECIDING WHICH SANCTION TO APPLY**

5.1. The officer(s) responsible for recommending a particular sanction *upon completion of an investigation* will satisfy themselves that the appropriate criteria has been met, and will record their decision accordingly.

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- 5.2. The Chief Legal and Administration Officer (CLAO) is responsible² for instituting and conducting all civil, criminal and administrative proceedings, except for Housing/Council Tax Benefit cases therefore, any decision to prosecute, issue a formal caution, or offer an administrative penalty shall normally be the Revenues Manager's responsibility.
- 5.3. Due to the frequency of Housing/Council Tax Benefit fraud and the dedicated resources that the Council has allocated to its investigation, the decision as to which sanction to apply will be the responsibility of the Revenues Manager, or in his absence, the Chief Finance and Performance Officer
- 5.4. Where cases are jointly investigated with another agency, then the decision as to which sanction to apply on behalf of the Council is the responsibility of the Revenues Manager for Housing/Council Tax Benefit cases and will depend upon the policies and decision of the partner agency.
- 5.5. If a decision is made against criminal proceedings, then the Chief Officer(s) of the service(s) concerned may make arrangements for recovery either from ongoing entitlement or via raising an official sundry debtors account.

6. **RESPONSIBILITIES IN RESPECT OF EACH SANCTION:**

6.1. **RESPONSIBILITIES IN RESPECT OF EACH SANCTION: PROSECUTION**

Reasons for Decisions to Prosecute

- 6.1.1. The Revenues Manager's decision to prosecute in Housing / Council Tax Benefit cases will be based on a written account of the evidence to date. The reasons for the decision will be recorded.

Time Limits

- 6.1.2. All staff involved in processing cases for prosecution shall take account of the time limits requirements of cases (usually determined by the type of offence).

Disclosure of Information

- 6.1.3. These procedures shall take account of the requirements of the Criminal Procedure and Investigations Act 1996 with regard to the disclosure of information concerning relevant material to lawyers. Consideration should also be given to the Data Protection Act 1998 and Freedom of Information Act 2000.

Responsibility for Conducting Prosecution

- 6.1.4. The responsibility for deciding *who* should conduct the prosecution of particular cases lies with the Revenues Manager for Benefit fraud cases.

² Under the Council's functions delegated to officers (other than matters specifically delegated to another officer)

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6.1.5. The Council will seek to encourage a mixed approach in regard to who conducts prosecutions. The Council's in-house Legal staff, outside solicitors, or by public sector prosecuting agencies, may therefore conduct them. Prosecution by other Council staff shall require the authorisation of the CLAO.

6.1.6. Circumstances may arise where investigation by the Police or an external agency may be more appropriate. In such cases, the prosecution will be conducted by who ever the Police or agency determines, such as the Crown Prosecution service.

Prosecutions by In-House Staff or by Solicitors

6.1.7. Where prosecutions are conducted in-house or by non-council solicitors these will be in agreement with the Chief Finance and Performance Office and/or Revenues Manager.

Prosecutions Conducted by the Police or Other External Agencies

6.1.8. The Revenues Manager shall appoint an officer who will lead liaison with the Police or external agency.

6.1.9. Prior to any Court action being taken in Housing/Council Tax Benefit cases, either via prosecution or in Civil court, then the amount of compensation and/or reimbursement of costs being sought shall be agreed in advance by the Revenues Manager.

6.2. RESPONSIBILITIES IN RESPECT OF EACH SANCTION: FORMAL CAUTIONS

6.2.1. The Revenues Manager's decision to issue a caution will be based on a written account of evidence to date, and knowledge of any previous convictions. The reasons for the decision will be recorded.

6.2.2. The responsibility for deciding *who* should administer the caution to the offender lies with the Revenues Manager.

6.2.3. If the Police or an external agency has made the investigation, the caution will be administered by whomever the Police or agency determines.

6.2.4. The officers who are allowed to administer the caution shall be suitably experienced so as to prevent the use of cautions being devalued in the eyes of the public. These officers are listed in Appendix C.

6.2.5. Wherever possible the officer who administers the caution should not have taken part in the interview under caution.

6.2.6. An appointment, in the Council offices other than in exceptional circumstances, shall be made with the person for whom the caution is intended. If the person fails to keep the appointment and then does not contact the Council within the

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time period suggested in guidance issued by the Department for Work and Pensions, then the case will be prepared for criminal proceedings.

6.2.7. If the person moves to another local authority area before the caution interview can be arranged, then the authority concerned may be requested to issue the caution instead.

6.2.8. The administration, preparation and conduct of the caution interview, and format, content and wording of the caution itself will be as suggested by the Department for Work and Pensions (DWP) and/or the Chief Legal and Administration Officer.

6.2.9. The officer who administers the caution shall ensure that:

- the person has signed a document to show that they admit to the offence,
- the person has agreed to the caution in writing and has acknowledged in writing that they have been issued with the caution and that they have accepted it,
- entry is made in the DWP's records,
- any refusal by the offender to accept the caution is recorded to enable this to be reported to any future Court hearing.
- a translator or interpreter is made available if necessary and that information is made available in alternative formats and languages other than English and Welsh, if required.

6.2.10. In Benefit fraud cases where benefits paid by the Department for Work and Pensions are also involved, then a officer appointed by the Council's Revenues Manager shall administer the caution jointly with DWP staff. The latter can only issue cautions in respect of benefits paid by the DWP.

6.2.11. If the offender does accept a caution, this will not prevent the Council from seeking recovery of any amounts overpaid as a result of the fraud.

6.3. RESPONSIBILITIES IN RESPECT OF EACH SANCTION: ADMINISTRATIVE PENALTIES

6.3.1. The offering of Administrative Penalties shall require the written authorisation of the Revenues Manager. This officer shall ensure that their offering, processing and recording is in accordance with relevant Social Security legislation and Department for Work and Pensions (DWP) procedures.

6.3.2. The Revenues Manager's decision will be based on a written account of the evidence to date. The reasons for the decision will be recorded.

6.3.3. The Revenues Manager will decide *who* is to administer the Penalty. The administering officer must be suitably experienced, and should not have been present during the interview-under-caution. These officers are listed in appendix C.

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- 6.3.4. The administering officer will ensure that a written notice, made in accordance with DWP guidelines, is given to the offender, stating the Council's intention to offer an Administrative Penalty.
- 6.3.5. The person for whom the penalty is intended shall be invited in writing to an appointment at the Council offices (other than in exceptional circumstances). This shall take the form of an interview (not under caution), and shall be used to provide the person with information about Administrative Penalties, and to offer them the chance of agreeing to pay one as an alternative course to prosecution.
- 6.3.6. If the person fails to keep the appointment and then does not contact the Council within the time period set by the DWP, then the case will be prepared by the Revenues Manager for criminal proceedings.
- 6.3.7. If the person moves to another local authority area before the penalty interview can be arranged, then that authority may be requested to issue the penalty instead.
- 6.3.8. If the person is also in receipt of benefits paid by the DWP, then the administering officer will contact the local DWP with a view to penalties being offered by both organisations in order to avoid different sanctions being applied.
- 6.3.9. The administration, preparation, format and conduct of penalty interviews will follow all relevant statutory requirements and DWP guidelines.
- 6.3.10. If they agree to the penalty, then the administering officer will ensure that the person signs an agreement. The format and wording of these will be based on DWP guidance.
- 6.3.11. The person to whom the penalty is intended will be allowed time to consider the offer in accordance with the time limits contained in DWP guidance.
- 6.3.12. If a penalty has been accepted, then the administering officer shall inform:
- the Council's Debtors section, who will contact the offender to arrange terms once the statutory 'cooling off' period has expired,
 - the DWP to enable entry to be made in the appropriate central records.
- 6.3.13. Where the person to whom the penalty is offered:
- rejects the offer of a penalty, or
 - changes their mind and withdraws their agreement within the 'cooling off' period, or
 - fails to agree to the offer after being given additional time, or
 - fails to keep an appointment to discuss the offer of a penalty,
- the Revenues Manager will then refer the case for prosecution.

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6.3.14. If, after having rejected the offer of a penalty, the person to whom it was offered changes their mind, then the Revenues Manager may agree to a new offer subject to what stage the prosecution is at.

6.4. **RESPONSIBILITIES IN RESPECT OF EACH SANCTION: OVERPAYMENT RECOVERY AND CIVIL COURT ACTION**

6.4.1. Recovery of fraudulently overpaid Housing / Council Tax Benefit may be made via the Debtors system or from ongoing entitlement, or by any system as approved by the Chief Finance and Performance Officer in accordance with the Financial Regulations.

6.4.2. Any overpayments remaining unpaid after a predetermined period will be referred for Civil Court action as appropriate in accordance with the Council's Debtors procedures.

6.4.3. The CLAO will advise the Revenues Manager and/or the Chief Finance and Performance Officer of:

- any evidence and documentation required,
- the form of any evidence required,
- details of any Court appearances that may be required,
- progress being made,
- the outcome of cases.

6.4.4. The CLAO shall be responsible for applying for any money judgements and costs.

7. **INVESTIGATION OF CASES IN RELATION TO THIS POLICY**

7.1. In accordance with statutory requirements and the Council's Financial Regulations, the responsibility for investigating Housing and Council Tax Benefits fraud lies with the Revenues Manager.

7.2. All staff routinely involved in fraud investigation will have sight of this policy and the Criminal Procedure and Investigations Act 1996 code of practice. In the course of their investigations, they will take account of the possible sanctions that could be applied. In particular, they will:

- seek to **establish the facts** in every alleged or suspected case,
- seek to gather **sufficient admissible evidence**,
- approach each investigation with an open mind,
- consider any likely Police requirements if it is decided at the outset of the investigation that the Police are to be involved,
- operate in accordance with the provisions of the Police and Criminal Evidence Act 1984,
- operate with due regard to the rights of the suspect and potential witnesses, particularly as contained in the Human Rights Act 1998 and the Regulation of Investigatory Powers Act 2000,

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- record and file their investigation work appropriately, confidentially and securely, and with due regard to Data Protection Act 1998 requirements,
- conduct all investigations with fairness, sensitivity, tact and discretion,
- provide translation and interpretation if necessary,
- make documents available upon request in alternative formats and languages other than Welsh or English, if required,
- act promptly in accordance with this policy,
- operate in accordance with the provisions of any other relevant legislation; the Council's financial regulations; other relevant Council regulations, policies and codes of conduct; the relevant codes of conduct of any professional organisations.

7.3. Any documentation relating to a prosecution or other form of sanction shall be retained in accordance with the requirements of the Criminal Procedure and Investigations Act 1996.

8. PUBLICITY AND REPORTING

8.1. Since a principal objective of this policy is to deter fraud, then any successful prosecutions or other sanctions should be suitably publicised where appropriate.

8.2. While any successful prosecution result will be considered for publicity, particular attention will be given to frauds that are large in value and/or where the offender has received a significant sentence. Only when damage to the Council's reputation is threatened, will publicity not be considered.

8.3. Following a successful prosecution the Chief Finance and Performance Officer, Revenues Manager, or Housing Benefits Fraud Manager shall arrange with the Council's Press Officer for a suitably worded press release to be prepared.

8.4. Other press releases may be considered from time to time, regardless of particular recent cases, such as reports of sanctions applied over a period.

8.5. Use shall also be made of Council-produced publications such as 'Connect' "The Mole", 'Update' and council intranet and internet websites to report results both to the public and to staff.

8.6. The Revenues Manager shall, at least annually, provide Housing Benefits assessment staff with a summary of results: Many of the results will be due to their vigilance and it is in the Council's best interest that this be encouraged.

8.7. The Revenues Manager shall advise the District Auditor where necessary.

8.8. In order to provide for accountability of the investigation and sanction functions, the Revenues Manager shall periodically provide the Chief Finance and Performance Officer with reports summarising results to date.

9. KEEPING THE POLICY TIMELY AND RELEVANT

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- 9.1. This policy is available to all elected members and Council employees via its inclusion in the Corporate Policies and Procedures Manual and on the Intranet.
- 9.2. Copies of the Policy are available for reference by staff involved in fraud investigation, prosecution, and the application of other sanctions, and reference to it is included in those employees' training plans.
- 9.3. Copies of the Policy are also given to any partner organisations involved in the combat of fraud, such as the Department for Work and Pensions and to any contractors or agents acting on the Council's behalf
- 9.4. It may also be made available on request to any interested external parties. This could include those against whom it is intended to apply sanctions, witnesses, solicitors, and advisors.
- 9.5. The Revenues Manager and/or Chief Legal and Administration Officer shall review the Policy. This will include:
 - monitoring its effectiveness,
 - taking account of any relevant changes in legislation and government guidance,
 - taking account of any structural changes either within the Council or between the Council and external organisations,
 - reviewing its relevance in view of changes in technology,
 - reviewing it in the light of comments received both inside and outside the Council.
- 9.6. This policy has been assessed for its impact on the diverse communities of Wrexham in accordance with legal duties to promote equality of opportunity, combat discrimination and promote good race relations as set out in the Race Relations Amendment Act 2000.
- 9.7. Wrexham County Borough Council is committed to equality and will operate this policy fairly and in accordance with the legislative framework.

EXTRACT FROM ANTI-FRAUD AND CORRUPTION STRATEGY

ANTI-FRAUD AND CORRUPTION POLICY STATEMENT

- **The Council will not tolerate any forms of fraud and corruption from within the Council, from external organisations, and from individuals.**
- **The Council is committed to the prevention, deterrence, detection and investigation of all forms of fraud and corruption at all levels of its activity, and in the wider community.**
- **The Council is committed to prevent and detect Housing/ Council Tax Benefits fraud.**
- **The Council will seek to prosecute or apply other appropriate sanctions to perpetrators of fraud and corruption.**

HOUSING/COUNCIL TAX BENEFIT FRAUD:

**DEPARTMENT FOR WORK AND PENSIONS –
GUIDANCE ON SANCTIONS³**

| <u>Value of Fraud</u> (£) | <u>Recommended Sanction</u> |
|--|------------------------------------|
| 0 – 2000 | Formal Caution |
| 0 – 2,000 | Administrative Penalty |
| No specified amount, depending on following, <ol style="list-style-type: none">1. Refusal to accept Formal Caution/ Administrative Penalty, and/or2. Previous similar offences have been committed, and/or3. An attempt to commit fraud where none of the other sanctions are appropriate | Prosecution |

APPENDIX C.

³ Guidance issued by Department of Social Security.

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Suitably Experienced Officer's for issuing Formal Cautions and Administrative Penalties.

| Officer's name | Officer's Post | Pins training |
|-------------------|----------------------------------|---|
| Mrs Lewis-Moreton | Benefit Fraud & Visiting Manager | PINS 1-7, PINS 6m & 7m, PINS 9, PNIS9a, NVQ level 4 |
| Mr Robinson | Investigator | PINS 1-7, PINS 6m & 7m, PINS 9, NVQ level3 |
| Mrs Davies | Investigator | PINS 1-7, PINS 6m & 7m, PINS 9, PINS 9a |
| Mr Corcoran | Investigator | PINS 1-7 PINS 9 |
| Mrs Solari | Investigator | PINS 1-7 PINS 9 |
| Mr Edwards | Investigator | PINS 1-7 PINS 9 |
| MissHensley | Investigator | PINS 1-7 |

Note :

1. Pins – Professionalism in Security

This is the main qualification for Benefit Fraud Investigators and is accredited by Portsmouth University