



Leicester  
City Council

**WARDS AFFECTED**  
All

**FORWARD TIMETABLE OF CONSULTATION AND MEETINGS:**  
**Audit and Risk Committee**

**16th July 2013**

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**Counter-Fraud Annual Report 2012 -13**

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**Joint Report of the Director of Finance and the Director of Environmental and Enforcement Services**

**1. Purpose of the Report**

- 1.1. Responsibility for the City Council's counter-fraud work is shared between the Corporate Counter-Fraud Team and the Revenues & Benefits Investigations Team both within Financial Services the Trading Standards Team within Environmental Services and the Tenancy Fraud Team within Housing.
- 1.2. The report, which is attached, provides information on counter-fraud activities during 2012 -13.

**2. Recommendations**

The Committee is recommended to:

- 2.1. Receive the report
- 2.2. Make any recommendations it sees fit either to the Executive or the Director of Finance, Director of Environmental Services or Director of Housing.

**3. Summary**

- 3.1. The annual report includes information on reports issued, the main influences on the level and standard of performance during 2012-13 and the key priorities for counter-fraud work in 2013-14. It does not include comment on the Council's Anti-Fraud and Corruption Policy which will be reviewed later in the year.
- 3.2. The key issues identified within the report are:

- The continued emergence of new external fraud threats to the Authority, in particular relating to cheque frauds
  - Continued success by the Revenues & Benefits Investigation Team in achieving high numbers of sanctions
  - The protection of vulnerable citizens through the work done by the Trading Standards Service
  - The setting up of a new Tenancy Fraud Team
  - Future plans of the Counter-Fraud Teams.
- 3.3. To deliver effective counter-fraud activities requires significant investment both from managers and from staff generally. Professional development, which is a key component of our counter-fraud work and strategy, must be relevant and topical so requires constant refreshing. New and emerging threats by increasingly sophisticated fraudsters and the opportunities for on line fraud require an equally sophisticated and vigilant response from the Authority. In addition, support from all parts of the Council is essential to ensuring the effectiveness of this work.
- 3.4. As part of its work, the Corporate Counter-Fraud Team investigates suspected financial irregularities and makes recommendations to reduce the risk of further losses and improve performance, efficiency, effectiveness and economy in the use of resources by the Council.
- 3.5. The Revenues & Benefits Investigation Team specifically investigates suspected Housing Benefit and Council Tax Fraud and when appropriate works closely with the Department for Work and Pensions to sanction offenders through prosecution, financial penalties and cautions.
- 3.6. The Trading Standards Service is responsible for fair trading, consumer credit, product safety, food standards, weights & measures and age restricted products.
- 3.7. The newly formed Tenancy Fraud Team works closely with the Revenues and Benefits Investigations Team to identify tenants who have left their properties and may be subletting them. The team will be seeking to prosecute tenancy fraudsters under the provisions of the recently enacted Prevention of Social Housing Fraud Act 2013.

#### **4. Report**

- 4.1. See the Counter-Fraud Review of the Year 2012-13, attached.

#### **5. Financial, Legal and Other Implications**

##### **5.1. Financial Implications**

Fraud can cause the Council significant loss and activity to prevent and detect fraud is a clear financial investment. Whilst it is impossible to quantify in any reliable way the full implications across the Council, sanctions were issued in

relation to £925,627.00 of overpaid Housing Benefit and Council Tax Benefit and potential fraud relating to contracts currently under investigation may amount to thousands of pounds.

Steve Charlesworth

Head of Finance (Financial Control)

## 5.2. Legal Implications

Fraud is a criminal offence and therefore represents breach of the law. Other forms of financial irregularity, though not criminal, may be in breach of regulation. The conduct of counter-fraud work of all kinds is bound by law and regulation and the Council is careful to ensure that its activities in this area are properly discharged.

## 5.3. Climate Change Implications

This report does not contain any significant climate change implications and therefore should not have a detrimental effect on the Council's climate change targets.

## 6. Other Implications

<b>OTHER IMPLICATIONS</b>	<b>YES/NO</b>	<b>Paragraph References Within Supporting Information</b>
Equal Opportunities	No	
Policy	No	
Sustainable and Environmental	No	
Crime and Disorder	Yes	This report is concerned with fraud and corruption, both of which are criminal offences.
Human Rights Act	No	
Elderly/People on Low Income	No	
Corporate Parenting	No	
Health Inequalities Impact	No	

## 7. Background papers – Local Government Act 1972

- 7.1. Files held by Internal Audit, Revenues and Benefits and Trading Standards  
 Leicester City Council's Anti-Fraud and Corruption Policy and Strategy  
 Leicester City Council's Finance Procedure Rules  
 Leicester City Council's Constitution

Leicester City Council's Code of Conduct for Behaviour at Work

Leicester City Council's Information Security Policy Statement

Leicester City Council's Prosecutions Policy

Leicester City Council's Internal Audit Charter

Leicester City Council's Investigators Code of Conduct

Public Bodies Corrupt Practices Act 1889

Chartered Institute of Public Finance & Accountancy (CIPFA) publication  
*Managing The Risk of Fraud*

The Prevention of Social Housing Fraud Act 2013

## **8. Consultations**

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## **9. Report Author**

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Director of Finance



**COUNTER-FRAUD  
REVIEW OF THE YEAR  
2012-13**

## **COUNTER-FRAUD REVIEW OF THE YEAR 2011-12**

### **1. Introduction**

- 1.1 This is a report to the Audit & Risk Committee on the work delivered by Leicester City Council's Corporate Counter-Fraud Team, Revenues & Benefits Investigations Team Trading Standards Service and Tenancy Fraud Team during the year 2012-13.
- 1.2 The Corporate Counter-Fraud Team (CCFT) is an independent appraisal function, established by the Council to investigate suspected financial irregularities involving matters other than Housing Benefit and Council Tax Benefit, conduct proactive fraud-searching exercises and improve fraud awareness amongst employees.
- 1.3 The Revenues & Benefits Investigations Team provides direct support for the investigation, detection, deterrence and prosecution of fraud related to Housing Benefit and Council Tax Benefit.
- 1.4 The Trading Standards Service is responsible for fair trading, consumer credit, product safety, weights & measures and age-restricted products. Food standards work in the City is now undertaken by the Food Safety Team.
- 1.5 The Tenancy Fraud Team investigates suspected illegal sublets with a view to returning Council properties back to the Authority. When the Prevention of Social Housing Fraud Act 2012 comes into force the Council will seek to prosecute offenders.
- 1.6 To facilitate their work, Corporate Counter-Fraud Officers have access to any relevant City Council information, data and records they require in order to carry out their duties. These rights of access are contained in the City Council's Finance Procedure Rules and Internal Audit Charter and extend to relevant information held by partner organisations and direct service providers.
- 1.7 Trading Standards Officers provide information and advice to businesses on regulations; undertake inspections of premises, products, contractual documentation and marketing; investigate possible breaches of the law and take legal action including injunctions, prosecutions and asset recovery to punish and deter illegal trading. Information and advice to the public on consumer problems is provided by Citizens Advice.

### **2 The Year in Summary**

- 2.1 The Council continues to benefit from having teams of fully qualified and experienced Accredited Counter-Fraud Specialists whose skill and ability continues to protect Leicester City Council and its residents from fraud and loss. The Revenues and Benefits Investigations Team is one of the highest performing in the country.

## **Corporate Counter-Fraud Team**

- 2.2 The team has reduced in size and strength over recent years as a result of decisions not to replace permanent officers who have left. Last year an experienced officer retired after almost 12 months sickness absence. The officer has not been replaced and temporary, inexperienced officers have been assisting the team. This has inevitably resulted in less proactive work being undertaken but the team has continued to deliver fraud awareness training. Current staffing comprises the Principal Investigations Officer (PIO), a Corporate Counter Fraud Officer, one temporary, part time investigator, one temporary Accounting Technician and two part time clerical support officers who between them work 33 hours per week.
- 2.3 The Corporate Counter-Fraud Team receive allegations about and investigate a wide variety of suspected irregularities including cheque manipulation and counterfeiting, thefts, flexible working hours abuse, corruption, contract and procurement irregularities, third party fraud including care home irregularities and grant aided organizations and misuse of City Council vehicles.
- 2.4 There has been a noticeable increase in the number of external threats, in particular involving instruments of payment with attempts to set up standing orders and direct debits from the Council's bank account and a large volume of counterfeit and forged cheques being reported.
- 2.5 Whilst it is sometimes possible to quantify losses incurred by the Council as a result of financial irregularities there are many instances where it is impossible to estimate the cost. For example where the procurement of goods or services has not been made in accordance with Council procedures and best value cannot be demonstrated or where it is not possible to determine how long an irregularity has been going on for.
- 2.6 The team makes unannounced visits to Council premises to secure evidence including data held on digital devices. Team members undertake surveillance and interview employees, members of the public and contractors. They liaise with the UK Border Agency, the Council's bank, the police and other external agencies involved in fraud prevention.
- 2.7 The team receives allegations from a variety of sources including whistleblowers. Thirty of the 131 referrals received in 2012/13 were made by whistleblowers compared to twenty five whistleblowing allegations received in 2011/12.
- 2.8 The team has investigated a variety of frauds involving employees, contractors and grant aided organizations. They have worked closely with the police, gathering evidence, taking statements and interviewing suspects. Some of these cases have not yet been concluded. Much of the work is complex and involves substantial sums of money and the team liaise closely with the Council's legal services section.
- 2.9 The team has worked with the Cashiers Team to tighten up on the payment of cash advances and to speed up the repayment of such advances following

a number of suspected irregularities. This has resulted in a reduction in the number of cash advances being requested and speedier repayments.

- 2.10 The PIO considers management requests for access to employees' emails, Internet access, computers and Cryptags (which gives access to the New Walk Centre buildings) information before they are authorized by the Director of Finance. During 2012-13, forty nine such requests for information were processed compared to fifty six in the previous year. The majority of requests were for information from more than one system and some requests were for information relating to a number of users.
- 2.11 The PIO is also the City Council's Key Contact for the Audit Commission's National Fraud Initiative (NFI) data matching exercise and coordinates the Council's response to the Audit Commission's annual on line fraud survey.
- 2.12 The NFI data required by the Audit Commission was submitted in October 2012 and has been matched against data submitted by other local authority and public sector bodies. The resultant matches were received in January 2013 and are being worked on by officers across the Council. The Corporate Counter Fraud Team is examining some of the matches relating to employees and to some matches relating to suspected identity theft.
- 2.13 Fraud awareness training has been delivered to 60 employees, this is the same number as in the previous year. The team also posts fraud warnings on INSITE and the schools Extranet. These are especially useful to alert employees to new and emerging threats.

### **Revenues & Benefits Investigations Team**

- 2.14 The team consists of an Investigations Manager and eleven Investigation Officers. Despite reduced staffing resources, due to periods of sickness and an investigator working two days per week on union duties, the Revenues & Benefits Investigations Team has achieved a high degree of success in uncovering benefit fraud.
- 2.15 During 2012-13 the team issued 221 sanctions which related to a record high of £925,627.00 of overpaid Housing Benefit or Council Tax Benefit. Although this sum is large, it represents less than 1% of the Council's annual expenditure on Housing Benefit and Council Tax Benefit.
- 2.16 The Revenues & Benefits Investigations Team have been instrumental in the new Tenancy Fraud Project which commenced during 2011-2012. This project is looking to identify, tackle and eradicate tenancy fraud within the Authority's housing stock and is in partnership with the Income Management Section of Housing. The project itself remains on-going and has taken time to set up as many aspects required consideration during the development and pilot stages; such as ensuring efficient data sharing agreements were in place and developing IT systems to properly support its needs. The Housing Department has been successful in securing £137,000.00 of additional funding from the Department for Communities and Local Government (DCLG)



to support the authority's work to tackle tenancy fraud for the next two financial years.

- 2.17 The Department for Work and Pensions (DWP) continue with the plan to implement a Single Fraud Investigation Service (SFIS) to tackle welfare benefit fraud. This will undoubtedly have a direct impact for the Authority and the Revenues and Benefits Investigations Team once implemented. At present the DWP are expanding the number of pilot sites to test and develop their plan for the service. A detailed report is expected from the DWP later in 2013-2014 which should give findings from the pilots and an indication of how SFIS will be implemented throughout the country. Once this has been published the potential impact on Local Authorities can be assessed.
- 2.18 The Revenues and Benefits Investigations Team assisted the Risk Management Section by providing investigation expertise on a suspected fraudulent insurance claim made against the authority. The investigation resulted in a prosecution, which was the first brought by the authority in respect of insurance claims made.
- 2.19 The introduction of Universal Credits, to replace working age benefits, including Housing Benefit, casts some doubt over the future of the Revenues & Benefits Investigations Team. Decisions on the level of staffing required will be made ahead of 2017, the proposed date for the full migration of the Housing Benefit caseload to Universal Credits.
- 2.20 Annual performance statistics for the Revenues and Benefits Team are attached at Appendix 1.

### **Trading Standards Service**

2.21 Trading Standards prioritised the following threats to the public in 2012-13:

- Doorstep crime targeting vulnerable citizens
- Counterfeiting, in particular, the supply of illicit tobacco
- Sale of tobacco and alcohol to children
- Illegal money lending
- Car safety and related fraud

2.22 Trading Standards manages its activity in line with the National Intelligence Model and undertakes a selection process to determine which cases should be investigated and/or whether any current investigations should be closed. The aim is to target problems/individuals that are, or are likely to cause high detriment to local citizens and reputable businesses. The capacity to take formal enforcement action on a high volume of complex cases is restricted.

2.23 A wide range of frauds have been investigated. Often an investigation that starts as a small straightforward fraud grows into a much larger fraud than is immediately apparent. For example an investigation into a single car clocking complaint resulted in an operation which has taken almost 12 months to

complete and has identified 23 clocked cars (at which point Trading Standards Management decided to impose a ringfence in order to bring the investigation to a conclusion).

- 2.24 In targeting our investigative resources and sharing intelligence with partner agencies we have found ourselves to be dealing increasingly with organised crime groups rather than rogue individuals.
- 2.25 During 2012-13 the Trading Standards Team has been involved in 7 major operations. These operations have been supported by the police and in some cases by what was formerly called the United Kingdom Border Agency.
- 2.26 Nineteen individuals were interviewed under caution in fraud related investigations.
- 2.27 To ascertain whether fraudulent activity was being undertaken and take possession of evidence seven Magistrates Warrants were obtained and executed. Following the execution of a warrant and seizure of material there is normally a forensic examination of computers and mobile phones to identify evidence of wrong doing.
- 2.28 On six occasions this year Trading Standards responded to urgent police requests for assistance where they had uncovered Trading Standards breaches during the course of their duties. Two of these related to counterfeit clothing, another to false claims that bangles being offered for sale and the others were doorstep crime incidents.
- 2.29 In autumn 2012 officers from the Trading Standards Service led two teams enforcing search warrants on local offices of a national company suspected of business related fraud. This investigation, which is being undertaken by the East Midlands Trading Standards Scambusters Team, is still ongoing.
- 2.30 Trading Standards has continued to prioritise the protection of vulnerable citizens from doorstep crime. Two investigations commenced where the victims' vulnerability had been taken advantage of. The nature of the victims and the perpetrators in doorstep crime incidents sometimes makes it difficult to quantify losses. One of these victims has lost £35,000 in the last year alone, the other victims losses are also likely to be substantial.
- 2.31 In 2012 the City Mayor directed officers to implement recommendations made by the Neighbourhood Scrutiny Commission in their report into safeguarding vulnerable adults from financial abuse by criminals masquerading as businesses. An officer has been assigned to support this programme of work and mainstream this aspect of safeguarding.

### **Tenancy Fraud Team**

- 2.32 A project to investigate tenancy fraud was set up by Housing Management in January 2012. Initially a datamatching exercise was undertaken to match tenant's records with Credit Reference Agency data. A large number of matches were produced and these were initially sifted by the Revenues and Benefits Investigations Team to determine whether there was the potential for criminal proceedings. No matches suitable for proceedings were identified. The matches were then passed to Housing Management for further investigation.

- 2.33 The team comprises a Team Leader who is also responsible for other duties, a tenancy management officer, a temporary part time agency employee and a part time admin officer. The funding secured from the DCLG will be used to recruit two temporary officers for two years. These posts are currently undergoing job evaluation.
- 2.34 Once appointed the officers will be undertaking enquiries on behalf of the Authority, Oadby and Wigston Borough Council and other social landlords within Leicestershire to identify tenancy fraud and bring about criminal proceedings under The Prevention of Social Housing Fraud Act 2013, which although enacted has not yet come into force.
- 2.35 Referrals to the team are also made by Housing Officers and members of the public and the team has its own hotline telephone number and email address.

### 3. Review of Performance

#### Corporate Counter-Fraud Team

3.1 The Corporate Counter-Fraud Team considers all cases of non-Housing Benefit suspected fraud and irregularity referred to it. Referrals are scored according to the seriousness of the allegation. In some cases an investigation is undertaken, in others, managers are given advice and assistance to enable them to take appropriate action, not only to deal with the matter of concern but also to help prevent recurrences.

3.2 The team has a number of performance targets which are reflected in the table below.

Table 1: Caseload statistics for the Corporate Counter-Fraud Team 2012-13

<b>File Holdings</b>		<b>Investigations</b>	<b>Advice &amp; Assistance</b>	<b>Total</b>
1	Cases brought forward at 01/04/2012	37	31	68
2	New cases in 2012- 2013	68	63	131
3	Cases carried forward at 01/04/2013 (including Advice & Assistance)	29	18	47

#### Performance Indicators

4	Investigations commenced in less than 10 days (including advice & assistance)	89
5	Cases open greater than 10 months at 31/03/2013	13
6	Total open cases at 31/03/2013 (including advice & assistance)	47
7	Total cases closed (including advice & assistance)	150
8	Cases registered and closed within 6 months of the commencement of investigation	100

		<b>Target</b>	<b>Actual</b>
9	Percentage investigations commenced within 10 days	90%	68%
10	Reports issued within 20 days of closure	90%	100%
11	Investigations closed within 6 months of investigation commencing	100%	67%
12	Files open more than 10 months old at year end	0%	28%

3.3 The number of referrals received is the same as the number of referrals received last year and the team has reduced the number of cases carried forward to the next financial year from 68 to 47.

3.4 The team continue to work closely with management and in many cases issues that have arisen as a result of the investigation are addressed before the investigation is concluded. This approach means that management is more actively involved and that the Counter Fraud Team are able to deal with more cases.

### **Revenues & Benefits Investigations Team**

3.5 The team secured a total of 221 sanctions during the financial year. The sanctions, against those found to have committed benefit fraud offences, consisted of 30 Formal Cautions (Warnings), 65 Administrative Penalties (Fines) and 126 Prosecutions. (See Table 1 below for the last four years' performance statistics).

3.6 The agreement that the Authority has with the Department for Work and Pensions (DWP) that joint investigations led by the Council are prosecuted via our own Legal Services Section and those investigations led by the DWP are prosecuted via The Crown Prosecution Service (CPS) continues to work well. This arrangement allows greater control over the time taken to conclude proceedings and is in keeping with the true spirit of joint working.

3.7 The Council continues to benefit from the assistance of the Authority's part funded Financial Investigator who is looking to ensure that the Proceeds of Crime Act 2002 is fully utilized where appropriate in cases of Benefit Fraud. The Financial Investigator is based in the Trading Standards service and currently works 2 days per week for the Authority and 3 days per week for Leicestershire County Council. The Revenues and Benefits Service are looking into the possibility of making the arrangement more permanent.

3.8 There are currently no national targets for benefit fraud investigations. This has led some local authorities to reduce the resources applied to benefit fraud. However, the Revenues & Benefits Section recognises the need for a fully staffed Investigations Team.

Table 1: Summary of Revenues & Benefits Investigations Activity

	2009-10	2010-11	2011-12	2012-13
Benefit Caseload	41,000	42,300	42,300	42,981
Total number of referrals received	1,323	1,412	1,259	1,349
Referrals passed to DWP to investigate	313	238	191	12
Referrals passed to R&B staff to resolve issues with claimant.	321	393	389	638
Cases allocated for full investigation	689	806	680	682
Cases closed with no fraud proven	398	454	395	461
Formal Cautions issued (warnings)	70	76	48	30
Administrative penalties issued (fines)	129	107	108	65
Prosecutions secured	92	98	129	126
<b>Total Sanctions</b>	<b>291</b>	<b>281</b>	<b>285</b>	<b>221</b>
Investigations closed	822	735	857	732
Sanctions per '000 caseload	7.09	6.69	6.78	5.14

% of investigations sanctioned	42%	38%	33%	30%
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3.9 The Council continues to benefit from successful prosecutions being reported in the local media on a regular basis. Publicity raises awareness within the community and hopefully acts as a deterrent to would be fraudsters.

### **Tenancy Fraud Team**

3.10 Enquiries undertaken by the tenancy fraud team have resulted in 66 properties being returned to the Council.

## **4. The Year Ahead**

### **4.1 Major objectives for the Corporate Counter Fraud-Team for 2012-13 are:**

- To manage the caseload within the resources available.
- To provide advice and assistance to managers in those cases where an investigation is not undertaken.
- To support the Council in its efforts to deal with fraud and irregularity whether internally focused or from customers or other third parties against the Council. In particular working with managers to increase fraud awareness and ensure that appropriate safeguards are in place to prevent, deter and detect fraud.
- To raise awareness, particularly at schools, of the increase in cheque irregularities
- To support the Director of Finance by identifying high fraud risk areas and working with management to mitigate those risks. Current initiatives include contracting arrangements (including monitoring of contracts), overtime payments and use of Council facilities (including vehicles).
- To manage the 2012/13 National Fraud Initiative exercise, ensuring that all data sets are considered and appropriate action taken where irregularities have occurred.

### **4.2 Major objectives for the Revenues & Benefits Investigations Team for 2013-14 are:**

- To continue to uncover and take action against those found to be committing benefit fraud.
- To ensure that appropriate sanctions are imposed in line with the Council's Prosecution Policy.

- To build upon the good working practices already established with the DWP fraud service by continuing to attend regular liaison meetings to address and resolve any issues.
- To look into the suitability and availability of refresher training for the Investigators to reinforce their accredited professional qualification.
- To participate in the NFI exercise in relation to benefit matches and raise investigations on appropriate cases.
- To identify, through the use of data matching, potential fraudulent claims for Single Person Discount and investigate accordingly.
- To continue to work in conjunction with Housing Services to review the Authority's housing stock of approximately 22,000 properties in an effort to identify potential tenancy fraud.
- To take all necessary steps ahead of the implementation of the Single Fraud Investigation Service.

**4.3 Major objectives for the Trading Standards Service for 2013-14 are to tackle the following:**

- Doorstep crime targeting vulnerable citizens
- Counterfeiting, in particular, the supply of illicit tobacco and counterfeit goods with significant health & safety risks
- Sale of tobacco and alcohol to children
- Illegal money lending
- Car safety and related fraud

Additional priorities include:

- Implementing local tier arrangements as set out in the Integrated Operating Model established by the National Trading Standards Board
- Introducing an IT case management system that can accommodate complex investigations and facilitate the production of case files/bundles for Legal Services
- Establishing referral and joint working arrangements with the Police for regional/national level frauds operating from Leicester City
- Establishing referral arrangements with Action Fraud Intelligence Hub.

**4.4 Major objectives for the Tenancy Fraud Team for 2013-14 are:**

- To recruit two temporary staff for two years to undertake investigations into suspected tenancy fraud.

- To identify and recover as many unlawfully let Council properties as possible.
- To utilise the powers available in the Prevention of Social Housing Fraud Act 2013 to prosecute tenancy fraudsters

## **5. Acknowledgment**

5.1 The Director of Finance acknowledges the efforts of all members of the Corporate Counter-Fraud Team, Revenues & Benefits Investigations Team, Trading Standards Service and Tenancy Fraud Team and the help, co-operation and support of Members and officers of the City Council.

Steve Charlesworth  
Head of Finance

Caroline Jackson  
Head of Revenues and Benefits

Roman Leszczyszyn  
Head of Regulatory Service



## Appendix 1

<b>Awaiting Registration &amp; Scoring</b>	
HB referrals awaiting registration	126

PLEASE COMPLETE/CHECK ALL CELLS IN :	GREY
Monthly HB figures	
Figures in 'BLUE' are formulas (DO NOT OVERTYPE)	

Registered	This month	YTD	Allocated to IO's	YTD	Screened Out	YTD	Overloaded	YTD
HB files	96	1349	45	682	48	638	3	12

Time taken to Allocate & Commence investigations	This month	YTD	cases > than 10 days	YTD
Registered and allocated within 10 days	95	1304	0	9
Investigations commenced within 10 days of allocation	38	538	5	74

Closed - (exc. S/O & O/L)	This month	YTD
HB	59	732

Closed - (inc. S/O & O/L)	This month	YTD	Inv's closed >6 mths old
HB	110	1386	15

Cases C/F	Prev. Mth	This Mth
HB	298	292

Investigations In Progress (exc. Sanctions) -	This Month	> 6 mths old
HB	292	57

Sanctions	Prev. Mth	This Mth	YTD - Total
Cautions Accepted	1	0	30
Administrative Penalties Accepted	5	11	65
Prosecutions - Successful (Guilty)	12	17	126
<b>Total Sanctions</b>	<b>18</b>	<b>28</b>	<b>221</b>
Referred to Solicitors for prosecution this month	12	11	N/A
<b>Total files with Solicitors</b>	<b>79</b>	<b>70</b>	N/A