

Corporate Anti Fraud Team (CAFT) Annual Report 2014/15

10th April 2015 Clair Green Acting Assurance Director

Executive Summary

The Council has a responsibility to protect the public purse through proper administration and control of the public funds and assets to which it has been entrusted. The work of the Corporate Anti Fraud Team supports this by continuing to provide an efficient value for money anti-fraud activity that is able to investigate all referrals that are passed to us to an appropriate outcome.

We continue to offer support and advice and assistance on all matters of fraud risks including prevention, detection, money laundering, other criminal activity, deterrent measures and policies and procedures, whilst delivering a cohesive approach that reflects best practice and supports all the corporate priorities.

All CAFT work is conducted within the appropriate legislation and the powers and responsibilities assigned to it as set out within the financial regulations section of the Council's constitution. CAFT supports the Council in its statutory obligation under section 151 of the Local Government Act 1972 to ensure the protection of public funds and to have an effective system of prevention and detection of fraud and corruption. It supports the Council's commitment to a zero tolerance approach to fraud, corruption, bribery and other irregularity including any Money Laundering activity.

Work processes in the team are designed for maximum efficiency and as such all functions are intrinsically linked and are dependent on each other in order to ensure CAFT continue to provide an efficient value for money counter fraud service and that is able to investigate all referrals or data matches to an appropriate outcome. CAFT provide advice and support to every aspect of the organisation including its partners and contractors. This advice varies between fraud risk, prevention and detection, money laundering and other criminal activity as well as misconduct and misuse of public funds. Some of the matters will progress to criminal investigation and others will not, but in all cases appropriate actions, such as disciplinary are taken. It is this element of the work of CAFT that is hard to quantify statistically.

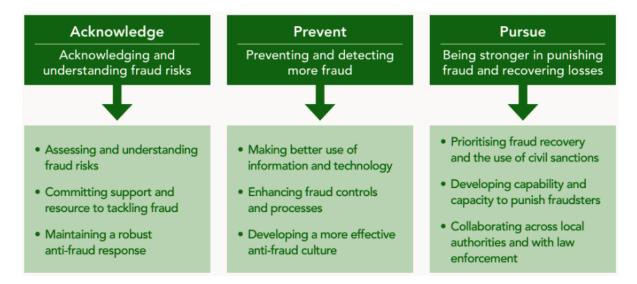
The purpose of this annual report is to provide a summary on the outcome of all CAFT work undertaken during 2014-15 including the objectives as set out in our annual strategy and plan.

Contents

1.	Annual Anti-Fraud Strategy	2
	Pro-active fraud plan	
3.	Performance Indicators	9
4.	Noteworthy investigations summaries:	12

1. Anti-Fraud Strategy

Our anti-fraud strategy is centred on the strategic approach as outlined in 'Fighting Fraud Locally' (Local Government Fraud Strategy) and provides a blueprint for a tougher response to tackle fraud. Within CAFT we adopted this approach and our work throughout the year compliments the objectives detailed below.



Acknowledging (and detecting) Fraud

Each year we assess our fraud risks against national fraud risks and local intelligence and review our anti-fraud strategy and incorporate this into our risk based annual plan. CAFT work closely with management in high fraud risk area's to ensure that working procedures and practices include robust fraud preventative measures. CAFT also conduct targeted proactive anti-fraud activity throughout the year, joint reviews with internal audit as well as re-active investigation work. Outcomes from reviews and investigations where appropriate are reported to management to support their on-going work and to assist in either confirming effective anti-fraud controls and or suggested areas for improvement.

We continue to work collaboratively with partners ensuring that anti-fraud arrangements are fit for purpose on all aspects of fraud risk. We have a working protocol with both CAPITA and Barnet Homes in relation to the contractual arrangements that address anti-fraud responsibilities.

Each year an annual risk based work plan is devised which also ensure that the CAFT team has sufficient resources in order to ensure that they are able to respond to demands and deliver the objectives as set out in the annual plan in order to deliver a robust anti-fraud response. There are effective, efficient anti-fraud procedures that ensure that we provide a effective value for money service. Progress against the annual plan as well as any emerging risks is reported quarterly to senior management and the Audit Committee.

In the last year CAFT provided Fraud awareness training to Barnet Homes staff to raise awareness around social housing fraud and to date this year have delivered sessions to 84 staff in housing options and across Barnet Homes. This has proved to be very popular and feedback has been very positive.

Preventing (and deterring) Fraud

We recognise that employees are often the first line of defence in preventing fraud. The Financial Regulations within the Council's Constitution places the responsibility for fraud prevention on all employees. Staff are aware that they should therefore be alerted to the possibility of fraud and to report any concerns to CAFT. We have a confidential reporting 'Whistle blowing' policy in place to

assist employees in reporting concerns about fraud and other issues without fear of harassment or victimisation. CAFT have a dedicated e-learning training programme which informs staff of their responsibilities and fraud risks.

CAFT use data matching techniques to identify possible fraudulent activity and centrally co-ordinate and investigate the Audit Commission National Fraud Initiative (NFI) data matching exercises to ensure that it is given high priority within services, we are also founding members of the London Fraud Hub which assists to combat tenancy fraud across London.

We have a communications strategy, whereby press releases are issued on all successful prosecutions to act as a deterrent factor to the community. During the last year we have taken part in a television production BBC's 'Saints and Scroungers' in which officers from CAFT presented the facts of complex and noteworthy benefit fraud investigations that the Council had successfully prosecuted, further details on our investigations and outcomes are reported quarterly.

All management and employees must abide by the Council's Employee Code of Conduct, which sets out requirements on staff conduct. Barnet also has in place comprehensive disciplinary procedures for all employees, those found to have breached the Code of Conduct will be dealt with in accordance with these procedures. We have effective liaison and working relationships with our HR team and where criminal activity is suspected or found, the matter must be referred to the CAFT team for investigation and possible prosecution, in accordance with the Counter Fraud Framework. Recompense will be sought from all who are found to have carried out fraudulent acts. A key preventative measure in that fight is the effective recruitment of employees. Employee recruitment is undertaken in accordance with the council's Recruitment and Selection Policy.

Pursuing Fraud (and seeking redress)

Within CAFT we ensure that each investigation is carried out in compliance with our policies and appropriate legislation, consistently apply 'zero Tolerance' approach reinforcing our policy that we take appropriate action against anyone who commits fraud whether they are members of staff or members of the public.

To this end we have developed a financial investigation team dedicated to this area of work. They liaise closely with other internal departments and external partner's (including the Police) that prosecute offenders in order to raise awareness around POCA and ensure that where possible financial investigations are undertaken by CAFT so that we can assist in the recovery of losses to the public purse and obtain where possible compensation and/or confiscation under the Proceeds of Crime Act (POCA).

We ensure that we utilise civil recovery procedures in relation to Tenancy Fraud and work collaboratively with other LA's and Law enforcement agencies to ensure best use of resources with holistic approach to counter fraud at all times.

2. Pro-active fraud plan

Table 1 provides an update against all pro-active activity as set out within the 2014/15 joint pro-active fraud plan and annual strategy with Internal Audit and Risk Management.

Area of review	Fraud Risk	Outcome
Your Choice Barnet – contract review (Q1 review Joint review with Internal Audit) Review to analyse a sample of employees within Care Homes to verify that they have legitimate identity documents and the right to work in the UK Disabled Blue Badges (Q1 Joint review with	There is a risk that care workers may be working without the appropriate clearances for eligibility or right to work. Valid parking income is not maximised and	CAFT reviewed all employment records of 123 YCB employees. Initially 89 were confirmed as valid and eligible to work in the UK. The remaining 34 were subject to further enquiries. All enquiries have now been completed and we are able to report that 120 have been confirmed valid and eligible to work in the UK – the three remaining members of staff are no longer employed by YCB. Full details and recommendations relating to this review can be found in the Internal Audit Quarter 1 and 2 Progress Reports. CAFT reviewed a sample of 92 of 500 badges that were recorded as applications made but
(Q1 Joint review with Internal Audit and Q3 proactive operation) A review of a sample of current blue badges to confirm legitimacy.	not maximised and collected as a result of non-valid and/or fraudulent blue badges remaining in circulation and being misused.	that were recorded as applications made but had not attended a face to face identity appointment results of this sample testing were reported CAFT carried out visits to the applicants. The results showed: 36 of the applicants stated that they had not received correspondence from the council informing them of the current state of their application; 9 applicants were deceased at the time of the visit; 5 applicants had received their badge in the post contrary to what the council system indicated; 3 applicants stated they did not want or need the badge since application; and 20 were unable to be contacted at the time of the review At the time of reporting 19 were reported as going through a process of further investigation as there are indications of application fraud – these related to badge applications that were made by a third party and not the disabled person; results of these investigation were

		 8 were confirmed as no fraud genuine applications 11 had insufficient evidence to warrant further investigation We agreed during joint review that we would commit to undertake annual proactive street operation which took place on one day in November in the Hendon and Golders Green area Full details and recommendations relating to this review can be found in the Internal Audit Quarter 1 and 3 Progress Report.
Transport contracts (Q2 Joint review with Internal Audit) Review to analyse a sample of invoices for verification purposes.	If validation of invoices does not take place then there is a risk of duplicate or fraudulent invoicing resulting in loss to the public purse.	As part of the CAFT review, we noted that two contractors who were not secured as part of the Street Scene PTS framework contract were used by Children's DU for transporting children. At the date of the report the delivery unit had ceased using these contractors and had alternative arrangements in place. Full details and all recommendations relating to this review can be found in the Internal
Residential Care Homes Pro active antifraud work in this area to ensure that the Council only fund placements when there is genuine eligibility.	If the Council continues to fund placements when there is no longer a need then scarce financial resources will be wasted.	Audit Quarter 2 Progress Report. This review has been carried forward into the 2015/16 plan.
Children's - Schools Admissions Proactive targeted antifraud work in this area to ensure the safeguarding of school placements.	Those fully entitled to placement at desirable schools within the borough are being deprived of place due to fraudulent applications	As part of the CAFT exercise we reviewed applications in respect of the three most desirable secondary schools in Barnet. A total of 24 applications were identified as containing potentially incorrect information and verification of these applications has been undertaken by CAFT officers. Of these 24, 9 cases have been concluded and referred back to school admissions for a decision to be made on their eligibility, from these 9 cases, 3 applications have already been confirmed as being withdrawn by the admissions team with the remaining 6 are still

	T	T
		awaiting decision at the time of reporting.
		There are also 15 cases that remain with CAFT
		pending further investigation.
		Further updates on this exercise will be
Adulta Damanal Dudanta	Foundation with the d	reported in 15/16 progress reports. This review has been carried forward into the
Adults - Personal Budgets / Direct Payments	Funds are misused, adequate care services are	2015/16 plan and will become part of our pro-
/ Direct rayments	not obtained by the budget	active work on National Fraud Initiative
Proactive anti-fraud work in	holder.	matches as there are 27 recommended
this area that will ensure		matches within this category that require
validity and legitimacy of		investigation.
high risk elements within		
the scheme.		Further updates on this exercise will be
		reported in 15/16 progress reports
Cross Cutting - Employee	Fraudulent / improper	This review is currently in progress and will
remuneration schemes	claims have been made /	reported in 15/16 progress reports.
Describe and for the state	authorised impacting the public purse	
Proactive anti-fraud review	public purse	
of all the various types of		
employee remuneration claims		
	Unauthorized / fraudulent	This review has been carried forward into the
Cross Cutting - Validation of vendor account details.	Unauthorised / fraudulent payments being released	2015/16 plan and is being conducted as part of
or venuor account accanor	impacting the public purse	the National Fraud Initiative exercise as there
Pro-active anti-fraud	resulting in potential	are more than 400 recorded matches that
review of the compilation	reputational damage	require investigation.
of vendor details and		
accounts		This exercise is being run using the NFI
		'duplicate records 'matches. The results so
		far have been useful in identifying areas where improvements need to be made
		regarding the categorizing and recording of
		invoices to allow a greater level of assurance
		that invoices are being paid correctly.
		Further updates on this exercise will be
		reported in 15/16 progress reports

Tenancy Fraud – Proactive	Pro-active data matching	In 2014/15 we have undertaken 5 pro-active
data matching exercise	exercise into specific areas	data matching exercises covering different
	of the borough to identify	postcodes, a targeted block of flats and a
	and tackle potential	number of decant properties in NW9, in order
	Tenancy Fraud case	to verify that the tenant of the property is
		actually resident in the property.
		Outcomes from these combined exercises
		include verification of tenants, awareness and
		deterrent factor for residents in relation to
		tenancy fraud and investigations which are
		reported in Performance Indicators section of
		the report.

3. Performance Indicators

Table 2 provides an update against all performance indicators as set out within the 2014/15 Joint proactive fraud plan and annual strategy with Internal Audit and Risk Management.

No targets are set against each of these indicators, as they are the results of CAFT re-active and continuous investigation work. Therefore the indicators, outcomes and direction of travel is reported for comparative statistical information only and not for benchmarking purposes.

Performance	Outcome	Outcome	Comments
Indicator	14/15	13/14	
systems through	various meth	ods including	rect fraud and error in our benefits and council tax dealing with the Department of Work and Pensions (MS) and the Audit Commissions (AC) National Fraud onduct assessments of benefit which may result in an enefit Investigation team to further investigate. This figure would indicate that our investigation techniques such as data matching, early intervention and joint working is having a positive impact towards combatting benefit fraud and error as the combined overall figure is 12.7% lower than that identified last year
(DWP) Housing B	enefit Data N	Natches (HBD	
Initiative (NFI) Be	nefit Matches	s. The team c	
Amount of council tax – single person discount fraud identified	£166,670	£120,286	This figure relates to the National Fraud initiative matches in relation to Council Tax Single Person Discounts; CAFT investigated 226 of those matches and established that the that residents were claiming discounts they were and not entitled to – the outcome figure is the financial saving that has been identified.

<u>Benefit Fraud Investigation Team</u> prevents, identifies, investigates, deters, sanctions or prosecutes persons that commit benefit fraud in Barnet. They operate in accordance within the DWP's Fraud and Error Strategy and the Council's Counter Fraud Framework as well as relevant governing legislation.

264	N/A	At the time of reporting we have 148 on-going benefit fraud investigations within CAFT carried forward into 2015/16.
338	201	
13	14	These figures relate to the differing sanctions that are available under the DWP's Fraud and Error
69	56	Strategy in relation to benefit fraud investigations where fraud is proven.
19	29	
101	99	
33.67	31	
	338 13 69 19	264 N/A 338 201 13 14 69 56 19 29 101 99

<u>Corporate Fraud Team</u> deal with the investigation of any criminal and fraud matters (except Benefit and Tenancy related fraud) attempted or committed within or against Barnet such as internal employee frauds, frauds by service recipients and any external frauds. They also conduct Financial Investigation under the Proceeds of Crime Act 2000 to ensure that any persons subject to a criminal investigation by Barnet do not profit from their criminal action. They work in partnership with UKBA, Police and HM Revenue and Customs to ensure that the public purse is adequately protected

Number of	28	10	Of the 38 on-going investigations, 23 relate to school		
carried forward			Admissions, 7 relate to Assisted travel, 2 relate to		
Fraud			waste and recycling, 1 relates to children's services,		
investigations			2 relate to Barnet Homes, 1 relates to Adults and		
from 13/14			Communities, and 2 relates to Finance and payroll		
Number of new	105	98			
fraud					
investigations					
(excluding					
financial cases)					

Total Number of closed fraud investigations Number of on-going fraud investigations Number of of carried forward Financial investigation is one of many specialist investigations of carried forward Financial investigation inv		T	T			
investigations Total number of on-going fraud investigation of on-going fraud investigations Number of carried forward Financial investigation is one of many specialist investigations investigations of carried forward fraudians and the fraction of carried forward fraudians and the fraction of carried forward fraudians of the fraction of carried forward fraudians of the fraction	Total Number of	100	94			
Total number of on-going fraud investigations Number of carried forward Financial investigation is one of many specialist investigations from 13/14 Number of new Financial investigations Number of new Financial investigations Number of closed financial investigations Number of on-going Financial investigations Total Number of on-going Financial investigations Number of on-going Financial investigations Total Number of on-going Financial investigations Number of on-going Financial investigations (see to Benefit Fraud and the recovery of funds back to the council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Number of of requests authorised for surveillance. Number of requests of the council surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of complete the council surveillance information purposes and to support statistical return to the Office of Surveillance Commissioners This is reported for information purposes only in accordance with our policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that information purposes and to support statistical return to the Office of Surveillance Commissioners This incompation on-going as at start of 2014/15. This information properties back to the council where Tenancy Fraud Investigations Of the 87 on-going investigations 6 are wit						
on-going fraud investigations Number of 5 arried forward Financial investigation is one of many specialist investigation is one of many specialist investigation is one of many specialist investigative approaches employed by Local Authorities when tackling criminal activity and it is an increasingly well-established discipline. Financial investigations Number of new Financial investigations Number of closed Financial investigations Number of closed Financial investigations 10 7 7 8 8 12 8 8 8 A Financial investigative approaches employed by Local Authorities when tackling criminal activity and it is an increasingly well-established discipline. Financial investigations the proceeds of Crime Act 20(POCA), which introduced a number of asset recovery powers, including the use of restraint orders and post-conviction confiscation orders as well as cash seizure and civil forfeiture/recovery. Related policies include the Asset Recovery Incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovered. Authorities to keep a proportion of assets recovery incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovery incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovery and the recovery of funds back to the council x money laundering case. Number of 3 2 2 Please refer to noteworthy investigations (section 4) of the report for further details for details of all 3 dismissals. Number of a 3 1 In accordance with our policy on Regulation of Investigatory Powers Act 2000 (RIPA) this is reported for information purposes only in accordance with our policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud has been proven. Number of cash service an						
Number of on-going Financial investigations Number of on-going Financial investigations Number of lew Financial investigations Number of losed Financial investigations Number of losed Financial investigations Number of on-going Financial investigations Nu		38				
Number of carried forward financial investigation is one of many specialist investigation is one of many specialist investigation is investigation investigation investigation is one of many specialist investigation investigation and investigation investigation of new financial investigations investigation	~ ~					
investigations from 3/14 Number of new financial investigations from 3/14 Number of new financial investigations from 3/14 Total Number of one-ginancial investigations from 3/14 Total Number of one-ginancial investigations from 3/14 Number of one-ginancial investigations from 3/14 Total Number of one-ginancial investigations from 3/14 Number of one-ginancial investigation for investigation for information purposes only investigations from 3/14 Number of one-ginancial investigation for investigations for a with our legal provider pending civil recovery action, 5 cases have had notice to quits the provider pending civil recovery action, 5 cases have had notice to quits an investigation on the mand the remaining 70 are current to the one-ginancial inve						
Financial investigations from 13/14 Number of new Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Total Number of one-going Financial investigations Number		5	8	, .		
Investigations from 13/14 Number of new Financial investigations Number of closed Financial investigations Total Number of on-going Financial investigations Number of on-going Financial investigations Number of of-going Financial investigations Number of of-going Financial investigations Number of on-going Financial investigati				investigative approaches employed by Local		
Number of new Financial investigations Number of losed Financial investigations Number of closed Financial investigations Number of congressions Number of congression				Authorities when tackling criminal activity and it is		
Number of new financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of closed Financial investigations Number of on-going Financial investigations on-going as at start of 2014/15. Number of on-going Financial investigations on-going investigations on-going as a to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quite recovery on them and the remaining 70 are current				an increasingly well-established discipline. Financial		
Financial investigations Number of cosed sinvestigations Number of dismarkations Number of di		10	_	investigators typically operate within the legal		
Investigations 10 12 12 12 12 13 13 14 14 15 15 15 16 15 15 16 16		10	/	framework of the Proceeds of Crime Act 2002		
Number of closed Financial investigations Total Number of on-going Financial investigations Number of a 3				(POCA), which introduced a number of asset		
orders and post-conviction confiscation orders as well as cash seizure and civil forfeiture/recovery. Related policies include the Asset Recovery Incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovered. Total Number of ongoing Financial investigations Number of dismissals as a result of a CAFT investigation. Number of surveillance. Number of surveillance of surveillance. Number of surveillance of su		10	12	, , , , , , , , , , , , , , , , , , , ,		
well as cash seizure and civil forfeiture/recovery. Related policies include the Asset Recovery Incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovered. Total Number of on-going Financial investigations Number of dismissals as a sesuit of a CAFT investigation. Number of authorities to recover of funds back to the council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Number of ac CAFT investigation. Number of of surveillance. Number of or surveillance. Number of or surveillance. Number of or surveillance. Number of sunder the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud Italiance		10	12	, , ,		
Related policies include the Asset Recovery Incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovered. Authorities to keep a proportion of assets recovered. Authorities to keep a proportion of assets recovered. Of the 10 financial investigations, 5 cases relate to Benefit Fraud and the recovery of funds back to the council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Number of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation. Number of of dismissals as a result of a CAFT investigation of Investigatory Powers Act 2000 (RIPA) this is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners Number of of dismissals as a result of a CAFT investigatory Powers Act 2000 (RIPA) this is reported for information purposes only in accordance with our policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of new Tenancy Fraud has been proven. 81 This figure relates to the number of investigations on-going as at start of 2014/15. This figure relates to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current servery action, 5 cases have had notice to quits served on them and the remaining 70 are current				•		
Incentivisation Scheme, which allows Local Authorities to keep a proportion of assets recovered.	investigations			- I		
Total Number of on-going Financial investigations as a council tax money laundering case. Number of dismissals as a result of a CAFT investigation. Number of requests authorised for surveillance the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Authorities to keep a proportion of assets recovered. Benefit Fraud and the recovery of funds back to the council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Please refer to noteworthy investigations (section 4) of the report for further details for details of all 3 dismissals. Number of requests authorised for surveillance for information purposes and to support statistical return to the Office of Surveillance Commissioners Number of swhistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. 81 This figure relates to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending criminal action, 5 cases have had notice to quits served on them and the remaining 70 are current				•		
Total Number of on-going Financial investigations, 5 cases relate to non-going Financial investigations Number of dismissals as a result of a CAFT investigation. Number of requests authorised for surveillance. Number of surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations Number of carried forward Tenancy Fraud investigations Number of carried forward Tenancy Fraud investigations 110 Number of carried forward Tenancy Fraud investigations 110 Number of colosed Tenancy 110 110 Number of colosed Tenancy 110 Number of colosed Tenancy				,		
Benefit Fraud and the recovery of funds back to the council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Number of dismissals as a result of a CAFT investigation. Number of requests authorised for surveillance. Number of surveillance. Number of council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where tenancy Fraud has been proven. 81 This figure relates to the number of investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current s	Total Number of	10	0			
investigations Council, 3 relate to planning enforcement cases, 1 relates to Trading standards and 1 relates to a council tax money laundering case. Number		10	0	_		
Number of a carried for surveillance. Number of surveillance. Number of concil's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud Investigations 81 This figure relates to the number of investigations of are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are currently virth our legal provider pending civil recovery on them and the remaining 70 are currently served on th				•		
Number of dismissals as a result of a CAFT investigation. Number of dismissals as a result of a CAFT investigation. Number of a cAFT investigation. Number of requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations on-going as at start of 2014/15. Total Number of closed Tenancy Total Number of closed Tenancy 110 CAFT in 13/14 server on the with our policy on Regulation of Investigations of the report for further details for details of all 3 dismissals. Please refer to noteworthy investigations (section 4) of the report for further details for details of all 3 dismissals. In accordance with our policy on Regulation of Investigation of Investigation of Investigation propers and to support statistical return to the Office of Surveillance Commissioners 1 This is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners 1 This is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners 2 This is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners 2 This is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners 3 This is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners 4 This is reported for information purposes an	investigations					
Number of dismissals as a result of a CAFT investigation. Number of dismissals as a result of a CAFT investigation. Number of requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 Please refer to noteworthy investigation for further details of all 3 dismissals. In accordance with our policy on Regulation of Investigatory Powers Act 2000 (RIPA) this is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners This is reported for information purposes only in accordance with our policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations on-going as at start of 2014/15. This figure relates to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits 13/14 as the served on them and the remaining 70 are current						
dismissals as a result of a CAFT investigation. Number of requests authorised for surveillance. Number of surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of tenancy Fraud investigations from 13/14 Served on them and the remaining 70 are current tenancy fraud investigations from 13/14 tenancy fraud investigations from 13/14 Total Number of tenancy fraud investigations from 13/14 tenancy fraud investigations from 13/14 tenancy fraud investigations from 13/14 Total Number of tenancy fraud investigations from 13/14 Each of the report for further details for details of investigation of Investi				·		
result of a CAFT investigation. Number of requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Number of the council with our legal provider pending criminal action, 6 cases are currently with our legal provider pending criminal action, 5 cases have had notice to quits served on them and the remaining 70 are current		3	2	Please refer to noteworthy investigations (section 4)		
Investigation. Number of requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations from 13/14 Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations from 13/14 as the served on them and the remaining 70 are current				of the report for further details for details of all 3		
Number of requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Number of closed Tenan				dismissals.		
requests authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud information was not recorded by CAFT in 13/14 as the 13/14	investigation.					
Investigatory Powers Act 2000 (RIPA) this is reported for information purposes and to support statistical return to the Office of Surveillance Commissioners Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud information was not recorded by CAFT in Closed Tenancy Total Number of closed Tenancy Total N	Number of	3	1	In accordance with our policy on Regulation of		
authorised for surveillance. Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Number of closed Tenancy 110 Total Number of closed Tenancy Total Numb	requests					
Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This information was not recorded by CAFT in Closed Tenancy 13/14 as the recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current	authorised for					
Number of referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This is reported for information purposes only in accordance with our policy. This is reported for information provided for information provided for information provided by the council where accordance with our policy. This is reported for information purposes only in accordance with our policy. This is reported for information provided by the council where accordance with our policy. This is reported for information provided persons that council where accordance with our policy. This is reported for information provided by the council where accordance with our policy. This is reported for information provided persons only in accordance with our policy. This is reported for information provided persons that council where accordance with our policy.	surveillance.					
referrals received under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 CAFT in 13/14 as the served on them and the remaining 70 are current	Number of	0	0			
under the council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Numb		o o	Ü			
council's whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Number of clos				accordance with our policy.		
whistleblowing policy. Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Total Number of closed Tenancy						
Tenancy Fraud Team prevent, identify, investigate, deter and sanction or prosecute persons that commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current						
Tenancy Fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 Tenancy Fraud information was not recorded by CAFT in closed Tenancy 13/14 as the served on them and the remaining 70 are current	_					
commit tenancy fraud in Barnet, ensuring maximising properties back to the council where Tenancy Fraud has been proven. Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 Sal This figure relates to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current		eam prevent.	identify, inve	estigate, deter and sanction or prosecute persons that		
Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy Number of new 110 Total Number of closed Tenancy Tenancy Fraud information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current						
Number of carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 Number of new Total Number of closed Tenancy 110 Number of new Total Number of closed Tenancy 110 Number of new This information was not recorded by CAFT in 13/14 as the closed Tenancy 120 131 This figure relates to the number of investigations on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current						
carried forward Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This information was not recorded by CAFT in 13/14 as the 13/14 as the on-going as at start of 2014/15. Of the 87 on-going investigations 6 are with our legal provider pending criminal action, 6 cases are currently with our legal provider pending civil recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current	· · · · · · · · · · · · · · · · · · ·			This figure relates to the number of investigations		
Tenancy Fraud investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 Total Number of closed Tenancy Tenancy Fraud information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current						
investigations from 13/14 Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This information was not recorded by CAFT in 13/14 as the closed Tenancy 120 This information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current.				5 656 at at attack of 201 i/ 15.		
Number of new Tenancy Fraud investigations Total Number of closed Tenancy 110 This information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current.	•					
Tenancy Fraud investigations Total Number of closed Tenancy information was not recorded by CAFT in 13/14 as the closed Tenancy information was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current	_					
Tenancy Fraud investigations information was not recorded by CAFT in closed Tenancy 13/14 as the served on them and the remaining 70 are current	·	116	This	Of the 87 on-going investigations 6 are with our legal		
investigations Total Number of closed Tenancy was not recorded by CAFT in 13/14 as the served on them and the remaining 70 are current	Tenancy Fraud		information			
Total Number of closed Tenancy 110 CAFT in recovery action, 5 cases have had notice to quits served on them and the remaining 70 are current						
closed Tenancy 13/14 as the served on them and the remaining 70 are current	Total Number of	110				
Fraud	closed Tenancy		_	•		
	Fraud		13/14 as the	Served on them and the remaining 70 are current		

Total number of on-going Tenancy Fraud Investigations.	87	Tenancy Fraud transferred to CAFT in November 2013.	investigations.
Number of properties recovered	48		48 properties have had their tenancies ended and are able to be re-let to those genuinely in need as a result of CAFT investigations into Tenancy Fraud. Please refer to noteworthy investigations (section 4) of the report for further details on example investigations.
Number of Criminal convictions	2		Please refer to noteworthy investigation sections (section 4) of report for further details.
Number of 'Right to Buy' applications denied as a result of CAFT intervention	24		This is the first year that we have proactively worked with the 'Right to Buy' in relation to Tenancy Fraud Intervention in this area which prevents the loss of valuable council assets.
Number of Applications denied as a result of CAFT intervention	2		This is the first year that we have proactively worked with the 'Housing Options' in relation to Tenancy Fraud Intervention in this area which prevents the fraudulent letting of valuable council assets.

4. A sample of noteworthy investigations summaries from 2014/15

Benefit Fraud Investigations

Ngesa - Relates to an investigation into a benefit claimant that had failed to declare his wife's earnings. When Mr Ngesa had applied for benefit in 2007 he claimed that his wife was not working, when in fact investigations revealed that she had been working continuously since 2003, other than a 2 month period of sick leave in 2007. Mr Ngesa was also employed, but he had declared his own employment. CAFT investigated this case and when interviewed under caution he answered all the questions, and admitted making mistakes but claimed that they were not intentional. The claim was cancelled and this resulted in an overpayment of £52,608 for the period 2007 – 2012. The matter was passed for prosecution. Mr Ngesa pleaded guilty and was sentenced to 6 weeks imprisonment suspended for 12 months with a requirement to undertake 120 hours of unpaid work, plus £500 towards the prosecution costs.

Mr Scarola – relates to a joint investigation with DWP into a benefit claimant that had failed to declare savings and part-time employment. Mr Scarola admitted under caution that he had deliberately failed to inform the departments of these details. The claim was reassessed and resulted in an overpayment of £12,534.54 for the period 2008 to 2010. There was also a DWP overpayment of £32,508.28. The matter was passed for prosecution. Mr Scarola pleaded guilty to 4 offences and was sentenced to 20 weeks imprisonment, suspended for two years, on each count.

Ms Potamitis - Relates to an joint investigation with Havering council and the Department for Work and Pensions (DWP) into a benefit claimant where there were concerns that the claimant may be related to

the owner of the property. CAFT investigated this matter and when interviewed under caution the claimant admitted that her brother was the owner of the property from which she was claiming benefit. She gave no explanation as to why she had not declared this on the various application forms. However on further investigation evidence showed that in fact Ms Potamitis was actually the owner of the property and so her benefit claim was cancelled. This resulted in an joint overpayment of £189,370.79 housing benefit for the period 1996 - 2013. The matter was passed for prosecution jointly with Havering Council as there were other family members conducting similar fraud in their Borough. Ms Potamitis pleaded guilty and was sentenced to 16 months imprisonment, suspended for 2 years. Confiscation proceedings are now on going to recover the lost funds

Mr Hunter - Relates to a joint investigation with the DWP into a benefit claimant where there were concerns that the claimant may have not declared capital in excess of £50,000. Mr Hunter was interviewed under caution and claimed that the capital belonged to his Mother but admitted he had opened the account. The benefit claim was cancelled by the DWP and Barnet Council and this resulted in an overpayment of £27,659.74 housing and council tax benefit for the period 2007 - 2013. The matter was passed for prosecution jointly with the DWP. Mr Hunter was found guilty and was sentenced to 24 months imprisonment, suspended for 12 months and ordered to do 150 hours unpaid work. He was ordered to pay compensation of the full amount of housing and council tax benefit within 28 days and has repaid this as directed.

Tenancy Fraud Investigations

Mr Gregory was assigned a one bedroom flat in the NW4 area in April 2014. Investigations revealed that he was advertising the property online and was actually living elsewhere. Mr Gregory was interviewed under caution about the matter and fully admitted that he was sub-letting the property. He returned the keys and surrendered his tenancy. He was prosecuted regarding the matter and pleaded guilty to two offences under the Fraud Act. Mr Gregory was sentenced to 8 weeks imprisonment for each offence to be served concurrently suspended for one year and was given a 12 month supervision order.

Mrs A had a two bedroom flat in the NW9 area. There were suspicions that Mrs A was not actually resident and the matter was passed to CAFT. Investigations began into the residency of the property and appeared to show Mrs A was actually living elsewhere. When she became aware that she was being investigated, Mrs A returned the keys to the property and surrendered the tenancy. Mrs A was interviewed under caution regarding a criminal offence and the trial date has now been set for prosecution.

Miss Stinson had a 3 bedroom house in the HA8 area. A referral was received indicating that she was living in Essex and another family member was sub-letting the house. Investigations began into her residency and also the fact that Miss Stinson was also receiving housing benefit in respect of the property. In view of the evidence gathered, Miss Stinson was asked to attend an interview under caution. She admitted that she had moved out and that her daughter was resident. In view of this fact, the housing benefit was cancelled and this resulted in an overpayment of £1623.14. Miss Stinson returned the keys to the property, but it was decided to pass this case to our legal section for offences regarding the tenancy and housing benefit fraud. Miss Stinson pleaded guilty, and was given a curfew order for 8 weeks and ordered to pay costs of £1170.00.

Mr and Mrs B had a 2 bedroom flat in NW9. As part of a pro-active data matching exercise, this case was investigated as there were concerns that tenants may not be resident. They were both invited in for interviews under cautions regarding their tenancy, as evidence indicated they owned three other properties and had been sub-letting their council property. A week before the interviews, Mrs B

handed the keys to the property back, however she was advised that both her and her husband still needed to be interviewed under caution as we had reasonable grounds to believe a criminal offence had been committed. Both Mr and Mrs B were interviewed under caution and the matter is with our legal section awaiting a court date for prosecution.

Corporate Fraud Investigations

Dismissal Case 1 —relates to an internal investigation into a Catering Services school based staff member after information was received which led us to believe that the staff member stole food from the school kitchen on a regular basis. CAFT officers attended the school to speak with the staff member and witnessed them leave the kitchen area with 2 large bags filled with food supplies. She was stopped and asked to empty her bags on to the table. The bag contained large quantities of food supplies from the school kitchen. Further investigations were made and the case was passed to the service to conduct a disciplinary hearing. A disciplinary hearing was held and the staff member was dismissed from the council for gross misconduct

Dismissal Case 2 – relates to a temporary member of staff who was found to be making a number of personal phone calls from a council phone at NLBP to family members living in Eastern Europe. Whilst the monetary value attributed to the calls was less than £50 it was felt that issue of trust and a breach of procedures was significant therefore the officer's employment with the council was terminated and reported to the agency

Dismissal Case 3 – relates to a member of staff who claimed ten times the amount of mileage expenses she was due. This was subsequently authorised and resulted in a wrong payment of over £4,000 instead of £400. The member of staff, knowing that she had been over paid and failing to inform Payroll, used the money, she claimed to pay off loans and buy new furniture. The member of staff became the subject of disciplinary action and was dismissed. The Manager who authorised the expenses resigned as a result of the investigation. This CAFT investigation was part of a pro-active CAFT exercise into validation of expense claims.

Case 4 - relates to an investigation into an offence of fraudulently obtaining refund payments in respect of the London Borough of Barnet's Council Tax refund process, totally £30,824. This fraud occurred whereby the Council Tax team arrange for the refund of overpaid amounts or cancellations due to vacation of property. The investigation revealed that this fraud was also spread across three other local authorities. Officers from Barnet's CAFT are the lead authority in this investigation. Directed and Communications surveillance were carried out to identify the suspect who was subsequently arrested, interviewed by CAFT officers and is awaiting trial for prosecution.

Case 5 - relates to a teacher who falsified documents in order to gain a school place for her own child in the school where she was a teacher. CAFT Investigators found that tenancy documents and letters from third parties had been changed in an effort to convince the school admissions team that the application was valid even though the applicant's real address was outside of the schools catchment area. The matter has been passed to the school for disciplinary action, which is currently in progress along with a review of the placement.