MANCHESTER CITY COUNCIL

MCC Counter Fraud & Irregularity Team

What does a good referral to the Counter Fraud team look like? Do's and Don'ts for Registered Providers

23 July 2026

Lisa Mealor & Chris Radford
Counter Fraud / Investigations Leads

Welcome and Objectives

Purpose

Reflect: what is working well / not so well between Counter Fraud and Housing Providers.

Share: practical lessons from referral and case activity.

Improve: referral quality, communication, consistency and shared outcomes.

What we want to achieve

Agree: what “good” looks like at the referral stage.

Reduce: avoidable delays/complications

Clarify: when activity should continue, pause or be discussed with Counter Fraud.

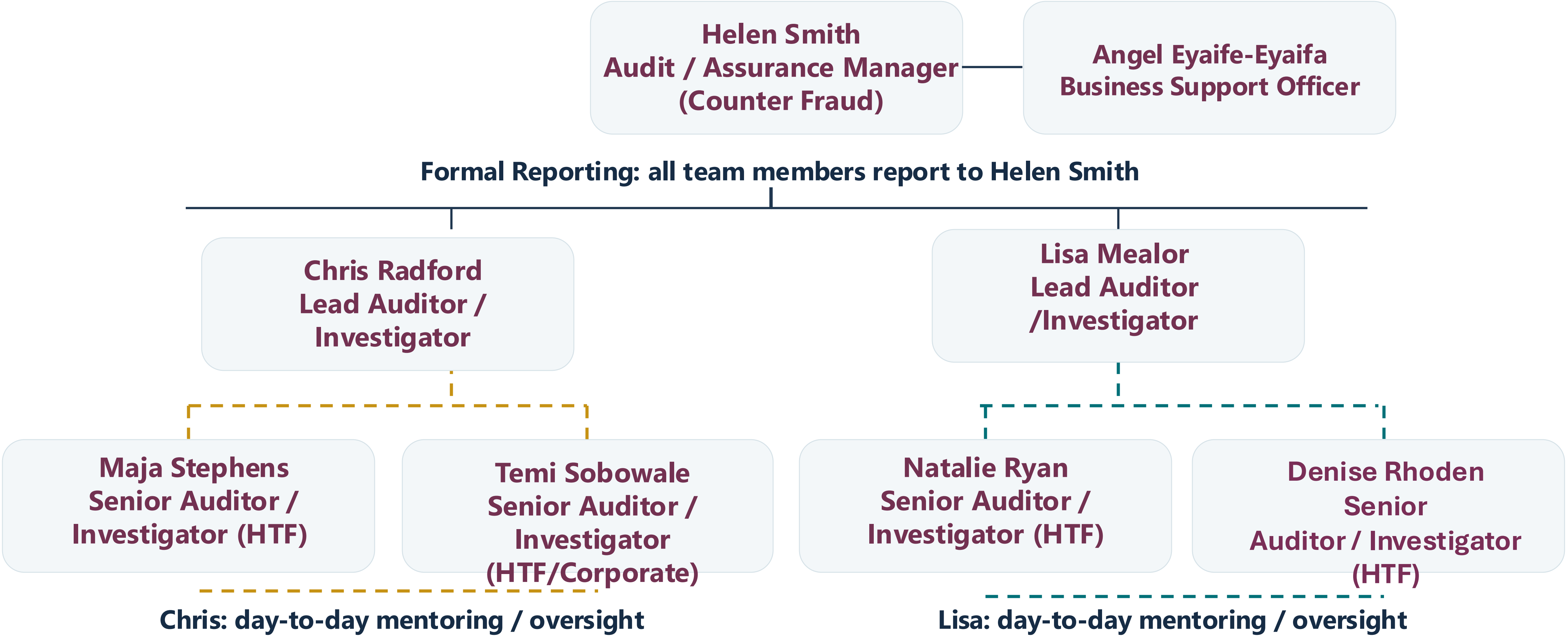
Key objectives

Avoid: extra bureaucracy and duplicated work.

Protect: evidential integrity through clear, timely records.

Outcome: a clearer, more consistent way of working which is legally compliant.

MCC Counter Fraud & Investigations – Team Structure



What is Counterfraud's Remit/Objective?

POINT TO REMEMBER

All referrals are started as a potential criminal investigation

This means records, evidence and next steps need to be handled carefully from the outset.

1. Keep notes factual and source-based
2. Preserve documents, photos and messages as potential evidence
3. Stop and check before further enquiries or tenant action

WE WILL DO THE INVESTIGATION FROM START TO FINISH, SO THAT YOU ARE ABLE TO CONTINUE WITH TENANCY MANAGEMENT/BUSINESS AS USUAL WORK

What Should You Refer to the Counter Fraud Team?

Things We Will Investigate

- Parting with possession/unlawful subletting
- False housing applications
- Abandonment
- Wrongful Succession
- Right to Buy / Right to Acquire fraud
- Unauthorised mutual exchanges
- Key selling
- Other offences involving dishonesty or false representation, i.e. Fraud by Abuse of Position

Things We Won't Investigate

- ASB complaints
- Neighbour disputes
- General tenancy breaches
- Debt recovery matters
- Relationship breakdowns
- Lodger arrangements (subletting part of property only)
- Requests to simply "prove where someone lives"

Note: Counter Fraud investigates suspected fraud offences – NOT general tenancy management issues.

How Allegations Typically Arise

Referrals can come from a range of sources and do not need proof of fraud — but the source, context and concern should be clearly recorded.

Common sources of allegations

- Neighbour complaints (ASB/gardens/noise)
- Contractor observations (gas safety etc)
- Failed tenancy reviews / visits
- Returned mail
- Housing Officer Concerns
- Information from other agencies (e.g. Police)
- NFI/Data Matching
- Whistleblowing Hotline (public/other agencies)
- Benefit-related queries / data inconsistencies
- Rents Team - 3rd party contact re: repairs/rent payments
- Customer Contact Centre - data protection check failures

Key message

Most cases begin with a concern rather than 'proof' of fraud.

A single indicator may not leave you confident that it may be fraud, leaving you unsure if to raise. We are here for advice, if you are in any doubt.

Multiple indicators should prompt a timely referral. Do not start a separate investigation: preserve routine evidence, record the source and refer early.

IA Housing Tenancy Fraud Referral Form – for Registered Providers

http://www.report-fraud.co.uk/manchestercity/28

Use the Prevention of Social Housing Fraud Referral Form for all referrals or concerns. Include your direct contact details (name, phone number and email) and complete every field - use “not known” or “N/A” where appropriate.

Once submitted, the referral will be logged automatically; pending review and allocation.

Keep and preserve all supporting information in a robust, retrievable way. The investigating officer will request this once the case is allocated and it is important that it is made available on a timely basis.

If the matter is urgent, email the Counter Fraud Lead after submitting the form - for example RTB/succession/rehousing applications or where evidence may be lost if not picked up quickly. Urgent requests will be reviewed by the Counter Fraud Manager/Leads, using a risk-based approach.

Note: Counter Fraud <u>must</u> receive a referral and set up a case before undertaking work. This ensures the appropriate legal gateways are in place before information is accessed.

What Happens After a Referral?

Counter Fraud will assess the referral, triage risk and agree proportionate next steps.

1. **Referral received and logged**
2. **Initial assessment / Allocation/ Liaison with Registered Provider**
3. **Decision on next steps**
4. **Investigation case opened**
5. **Enquiries made**
6. **Case monitoring, outcome and feedback**

Key message

Early referral and engagement allow concerns to be assessed promptly, evidence to be preserved and proportionate/targeted action to be agreed.

Why Does Referral Quality Matter?

- Referral quality helps Counter Fraud to triage cases quickly and decide whether to prioritise, what information requests to make/action required.
- Clear information helps investigators identify possible offences, scope enquiries and avoid duplicated effort.
- Well-recorded evidence may later support witness statements, tenancy action, interviews under caution or legal proceedings. Your referral may be disclosable.
- Poor records, unclear source information or unnecessary enquiries can create disclosure, GDPR, proportionality and evidential risks.

Summary: provide a clear, accurate and concise summary of the suspected offence, naming the tenant, subtenant or other occupiers where known. Focus on any potential offence .

Good Referrals Lead to Better Outcomes

We don't expect you to prove fraud — we just need clear concerns and timely contact.

Your role Identify potential indicators, record concerns and share all relevant information. The Counter Fraud Team will assess and investigate where dishonesty may be involved.

We do need

✓ A clear explanation of the concern
✓ Who raised it and when
✓ Relevant tenancy information
✓ Observations made by staff
✓ Routine tenancy activity already undertaken
✓ Copies of records made available to us

We don't expect you to

✕ Prove fraud
✕ Conduct investigations/interviews with tenant
✕ Gather extensive evidence before making contact

Key message

Identify. Record. Refer.

Housing providers are often the first to identify concerns. Recognise indicators, record relevant information and make timely referrals; Counter Fraud will assess where dishonesty may be involved.

What information to include in a strong referral

Who
Tenant/subject details, contact details, household composition and known occupiers.

What
Suspected fraud type: subletting, abandonment, succession, false application, RTB/RTA or other.

When
When concerns first arose, key dates and potential timeframe.

Where
Tenancy address, alternative address, vehicles and property layout.

How known
Source of information: observation, report, visit, contact log, system record or document.

Documentation needed
Tenancy file, rent account, visits, photos, fobs/CCTV, gas access and emails.

Action taken
Any contact, visits, warnings, notices, possession action or tenant engagement.

Risk/status/other
Whether tenant is aware, statement potential and urgent deadlines.

N/A is fine
Complete every section, even if the answer is “unknown” or “not applicable”.

Common Referral Pitfalls

Avoiding these issues helps protect the tenancy management route and the investigation route.

Common issues

Waiting too long before referring to Counter Fraud
Investigating before referral – when all other avenues exhausted
Investigating after referral by continuing enquiries once referred.
Poor record keeping or missing source details.
Assumptions / opinions in notes, referrals or email correspondence.
Circulating emails to people who do not need to know.
Missing tenancy information or key checks already undertaken.
Insufficient context about what the allegation is and why it matters.
Alerting the tenant to suspicions or referral activity.

Key message

Focus on identifying concerns, recording factual information and making timely referrals — not proving fraud.

Send it over: we will assess the referral and advise on next steps.

The next slides unpack the most common risks and how to avoid them.

CPIA 1996 — What You Need To Know

CPIA - Criminal Procedure and Investigations Act 1996 — the criminal investigation and disclosure framework for recording, retaining and revealing relevant material.

What CPIA is

Legal framework: sets standards for criminal investigations and disclosure.

Record and retain: keep notes, emails, photos, messages and documents.

Reveal all material: including information that may support or undermine an allegation.

Fairness focus: helps ensure decisions are lawful, balanced and transparent.

What this means for Registered Providers

Records may be evidence: housing notes, emails and visit records can become part of the case/evidence.

Keep it factual: record what happened, when, who said it and the source.

Preserve originals: do not delete, alter or overwrite relevant material after concerns arise.

Check before enquiries: avoid actions that could affect evidence, disclosure or fairness.

Key messages

CPIA is the framework for criminal investigations and disclosure.

MCC Counter Fraud runs the criminal investigation; provider records may become relevant material.

Treat anything created or received about a potential fraud concern as potentially disclosable.

Keep records factual, preserve originals and check before making enquiries that could affect evidence or fairness.

Evidence file: core documents required by Investigations at the initial phase

- Tenancy agreement, sign-up documents, tenancy application and ID held.
- Contact details held for tenant; identify when last used (may help to escalate an IPA request).
- Rent statement and notes on rent account/contact history.
- Visit reports, property audits, inspection notes, photos and all relevant system notes.
- Copies of relevant tenant/subtenant emails or correspondence.
- Details of CCTV/fob data held, coverage, logs available and retention period.
- Gas access certificates/records and notes from contractors or officers who accessed the property.
- Previous allegations, warnings, failed appointments or tenancy concerns, with outcomes.

NOTE – WE WILL ASK FOR THESE DETAILS AT THE START OF OUR INVESTIGATION

Tenancy audits / property visits: recommended actions when suspicions arise

During the visit - record facts

- Make contemporaneous notes: date, time, who attended, what was said and what was observed.
- Record who appears to live there, rooms used, belongings present or absent, and any inconsistency with tenancy/household records - Know Your Customer (KYC)
- Where appropriate, photograph relevant evidence and note why it may be relevant
- Examine ID, cross reference to person and take a copy.
- Record vehicles clearly linked to the address: make, model, colour, registration, date/time and who observed it.

If a concern arises – gather/preserve evidence

- Ask open, practical questions; do not make allegations or alert the tenant to a potential investigation.
- If a subtenant or other occupier is present, capture contact details, rent arrangements and any documents or messages they are willing to share.
- Obtain potential “landlord” details, addresses, email addresses and phone numbers if possible.
- Ask whether the subtenant would be willing to speak to Counter Fraud and/or provide a statement.
- Refer promptly with the evidence pack; flag safeguarding or immediate risk concerns through normal channels.

Common issue 1: piecemeal information / gaps

DON'T	Send documents in stages with gaps, unclear chronology or missing core records.
WHY IT MATTERS	This could delay triage, create duplicate requests and makes it harder to assess the overall evidential picture. Note that Counter Fraud will need the full file to decide what is relevant and spot material that may support or undermine the case.
DO — BETTER PRACTICE	Send an ordered evidence pack, list what is included, and clearly identify anything not held or still outstanding. Keep us updated on any key developments at your end.

Common issue 2: unclear source information

DON'T	Use referral wording or make statements that do not explain where concerns or information came from.
WHY IT MATTERS	Unsupported comments are harder to rely on and may weaken credibility. Source detail helps Counter Fraud to direct their enquiries, assess/preserve the best evidence; avoiding any unnecessary checks.
DO — BETTER PRACTICE	Record whether information came from direct observation, another officer, a neighbour, system records, CCTV, fob data, or tenant/subtenant contact.

Common issue 3: continuing enquiries after referral

DON'T	Continue with any offence-related checks, contact the tenant about the allegation or repeat investigative activity after referral, without firstly agreeing it with Counter Fraud.
WHY IT MATTERS	This can duplicate work, create proportionality or legality issues, tip off the tenant which may prejudice future enquiries, including the admissibility of evidence.
DO — BETTER PRACTICE	Continue normal tenancy management where appropriate but keep Counter Fraud informed. Speak to us before taking any action that may affect the investigation.

Common issue 4: Failure to keep Counter Fraud informed of Key Developments

DON'T	Take tenancy action, hold substantive discussions with the tenant, or make surrender/closure decisions without telling Counter Fraud once a case has been referred.
WHY IT MATTERS	A surrendered property does not automatically end a criminal investigation. Developments may affect offences, unlawful profit orders, sanctions, disclosure and the civil/criminal evidence position.
DO — BETTER PRACTICE	Keep us updated on key tenancy actions and decisions. Before significant action, check whether it could affect the investigation or what evidence can be shared while criminal enquiries are ongoing.

Common issue 5: notifying DWP/MBS too early

DON'T	Notify MBS/DWP of suspected tenancy fraud, or ask them to stop benefits, before Counter Fraud has had an opportunity to assess the referral.
WHY IT MATTERS	Counter Fraud can notify at the right time and work jointly with DWP where benefit offences may be involved. Alerting others may unnecessarily tip off the tenant or jeopardise our criminal enquiries.
DO — BETTER PRACTICE	Tell Counter Fraud once, promptly. We will assess who needs to know, whether joint working is needed, and when notifications should be made and advise you accordingly.

Common issue 6: communication risks

DON'T	Use internal or external communications that express guilt, opinions, bias, frustration or speculation - especially whilst the investigation has not concluded.
WHY IT MATTERS	Notes, emails and records may be disclosable in an interview under caution, legal proceedings or a Subject Access Request, and may be scrutinised for GDPR issues.
DO — BETTER PRACTICE	Use factual, neutral wording. Avoid emojis and unnecessary personal data. Copy only those with a clear operational need; if wider awareness is needed, share a concise summary.

The “stop and check” moments for Registered Providers

Before making attempts to contact the tenant or visit the property - unless business as usual.

Before serving NTQ/NSP, encouraging surrender or progressing possession action.

- **Basis of Notice – what is it?**
- **Evidence Led – what evidence do you have?**
- **Fraud Referral – have you submtted one?**

Before sharing personal data beyond officers who need it for a defined purpose.

THINK ABOUT HOW ANY ACTION MAY IMPACT UPON AN ACTIVE INVESTIGATION.
IF IN DOUBT, JUST CALL US – WE CAN ADVISE

What is Working Well and Why

Examples show that early referral and structured collaboration improve case progression.

1. Early engagement with Counter Fraud

What

When RPs become aware of a potential issue, early referral can help preserve evidence before it is lost.

Why

Early contact helps Investigations understand the background and direct enquiries proportionately.

2. Collaboration

What

Coordinated visits can maintain momentum.

Why

Joint working avoids duplication and gives a clearer message to tenants / subtenants.

3. Structured information

What

Structured information helps Investigations quickly understand events.

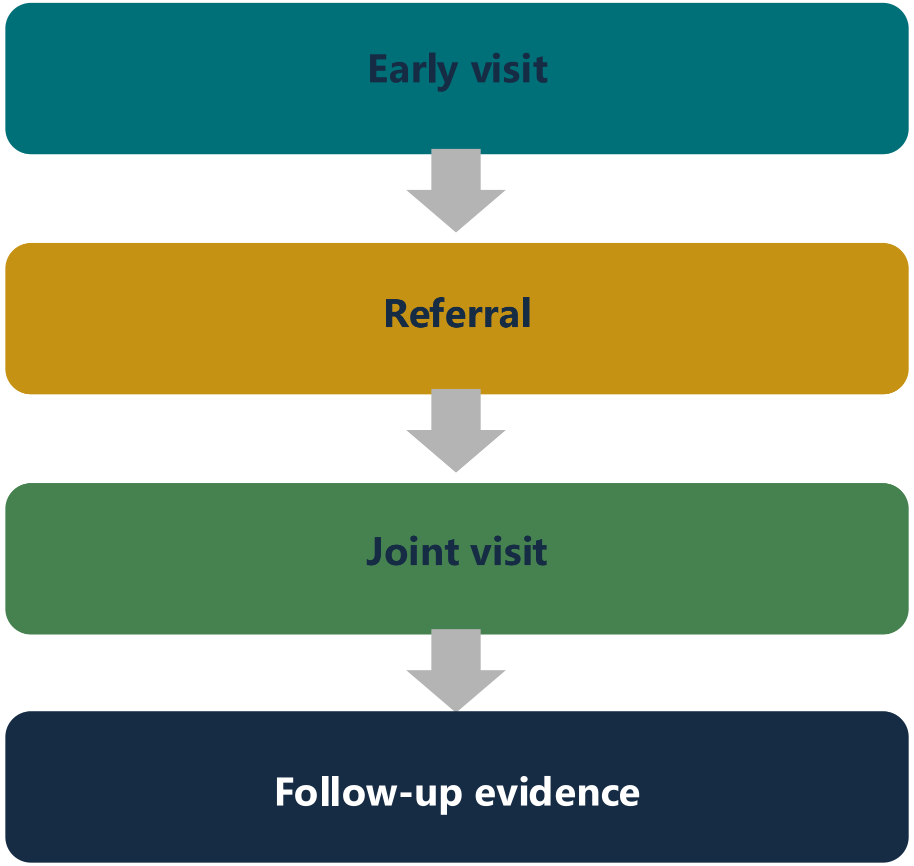
Why

Good information sharing focuses effort and supports early decision-making.

Case study 1: RTB/Subletting investigation

A concise example of good practice in early engagement, collaboration and timely evidence gathering.

- Before referral, the Housing Officer visited the property and obtained ID, contact details and an initial account from the subtenant. This preserved key information before the subtenant left and then could not be traced.
- A later joint visit supported the delivery of interview-under-caution correspondence and showed how collaborative working can help to keep enquiries moving.
- We interviewed the tenant and asked the HO to attend the property for a second time. A witness statement was requested from the HO to preserve the details and circumstances of the visit.
- We are in the process of following additional lines of enquiry. We intend to invite the tenant to a second IUC in the near future, where the witness statement will be used.

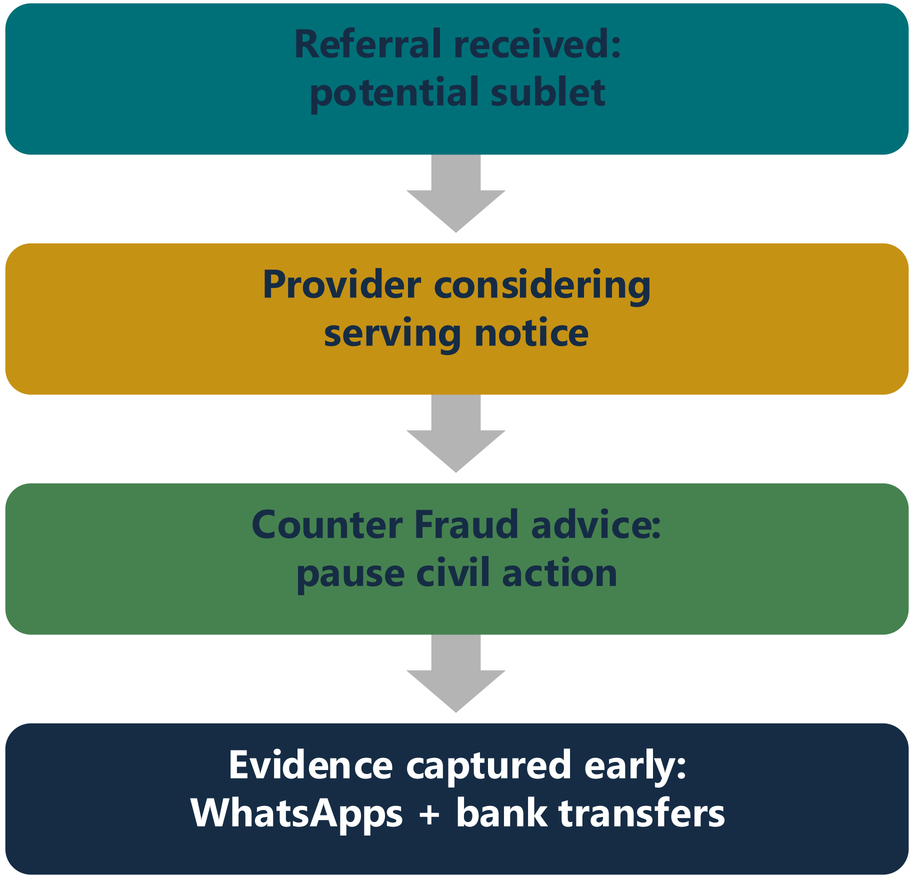


Case study 2: Early engagement, collaboration & evidence gathering

Early advice from Counter Fraud paused civil action while preserved evidence made enquiries more efficient.

Early engagement avoided premature action and secured evidence.

- A referral was received where the Registered Provider (RP) suspected potential subletting activity and was preparing to serve notice (NTQ) based on the evidence already gathered by them.
- The RP had already spoken to the subtenant, secured WhatsApp messages and captured evidence of bank transfers, which made our enquiries more efficient and helped focus the investigation from the outset.
- Counter Fraud advised the RP not to progress with civil action, whilst the investigation was ongoing. This advice was taken on board; recovery action has paused whilst investigative enquiries into criminal offences continue.

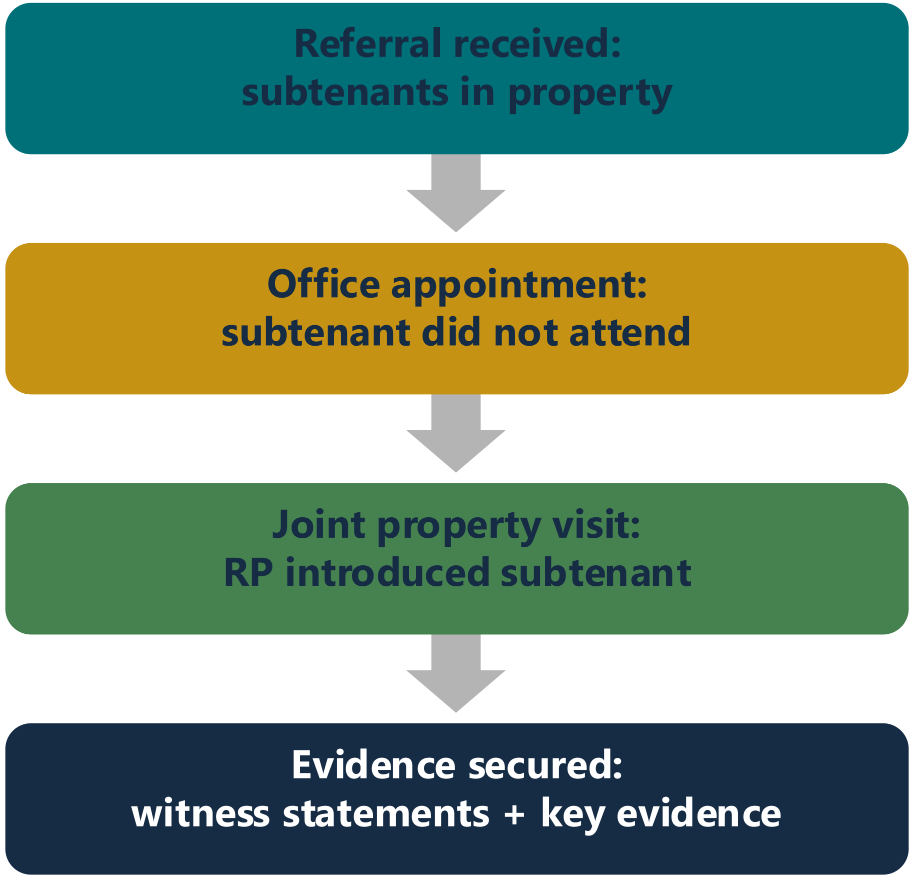


Case study 3: Early engagement, collaboration & evidence gathering

Joint attendance secured witness statements and key evidence before the subtenant left the property.

Joint attendance secured evidence before it was lost.

- **Concern identified:** The RP had spoken to the subtenants at the property and invited them to their offices to give their account.
- **Counter Fraud involved early:** We were notified of this and so asked to attend / lead the conversation so a formal witness account could be taken.
- **Appointment missed:** When the subtenant did not attend the offices, we suggested a joint property visit, as we were already on site, maintaining momentum.
- **RP support helped:** The RP attended with us, introduced us to the subtenant, allowing witness statements and key evidence, including a tenancy agreement, bank statements and text messages to be secured.
- **Key learning:** The subtenants later left, so acting at that point meant important evidence was not lost.
- **Where are we now:** We are currently in the process of arranging an IUC with the tenant, where this evidence will be used.



Referral stage: recommended Do’s and Don’ts for Registered Providers

Recommended Do’s

- Submit all new concerns early, via the referral form, with your **direct contact details** (email/direct dial).
- Record what was seen, said and done at the time.
- Know your tenant before visits. Capture dates, times, who was present and how information was obtained.
- Gather only practical evidence from routine contact or visits.
- Observe ID and obtain signatures where possible.
- Make tenancy history, rent records, visit notes, photos and contact logs available for us.
- Keep internal communication factual, proportionate and professional.

Recommended Don’ts

- Tell tenants, subtenants or others that a fraud referral is being made.
- Notify DWP or Manchester Benefits Service before Counter Fraud advises.
- Carry out separate investigation activity after referral. This is our role.
- Confront the tenant or signal suspicions (tip off)
- Run social-media, surveillance-type or repeated checks without a clear lawful basis.
- Serve NTQ/NSP or encourage termination without speaking to Counter Fraud first.
- Use speculation, emojis or emotive wording; avoid unnecessary email copying.

Discussion: can your system flag that a fraud referral has been made?

Moving forward: a structured way of working

Named relationships, regular check-ins and shared learning improve referrals, reduce rework and strengthen outcomes.

Shared benefits

Stronger partnership working: closer relationships, aligned priorities and embedded best practice.

Clearer expectations: agreed evidence standards, timelines and points to pause activity.

Less duplication: gaps are identified early and action is coordinated.

Better referrals: clearer chronology and stronger evidence from the outset.

Earlier insight: understanding provider business priorities and housing stock profile, including where different stock types may be more exposed to certain fraud risks.

Stronger MI: consistent actions, outcomes and learning for reporting.

Relationship rhythm

1. **Named provider lead**
2. **Periodic check-in meeting**
3. **Action, outcome & learning log**
4. **MI feedback to Steering Group**

Overall purpose: better outcomes for Manchester residents and reduced homelessness

Improving MI - What needs to be recorded/reported to CounterFraud

Subletting / Abandonment	Right to Buy / Right to Acquire	Succession	False Application
Keys returned during amnesty *RP's : during February 26*	Withdrawal of application *Following commencement of verification/investigative checks and contact with applicant*	Withdrawal of application *Following commencement of verificaton/investigative checks and contact with applicant*	Withdrawal of application *Following commencement of verification/investigative checks and contact with applicant*
Keys returned *RP's other period*	Blocked / Refused *Following verification/investigative checks*	Blocked/Refused (before obtaining property) *Following verification/investigative checks*	Re-prioritised application *Following verification/investigative checks*
Warning Letters *Issued by MCC CF Team*	Recovery of discount post sale *Following investigation by MCC CF Team*	Property recovered (once residing in property) *Following investigation by MCC CF Team*	Blocked/refused Following verification/investigative checks
Caution Issued *Issued by MCC CF Team*	*Recovery of Property* *following investigation*	*Caution* *Issued by MCC CF Team*	Warning Letters *issued by MCC CF Team*
Criminal Prosecution *Undertaken by MCC CF Team*	Caution *Issued by MCC CF Team*	Criminal Prosecution *Undertaken by MCC CF Team*	*Caution Issued* *by MCC CF Team*
Civil Proceedings *Completed by RP*	Criminal Prosecution *Undertaken by MCC CF Team*	Civil Proceedings *Completed by RP*	Criminal Prosecution *by MCC CF Team*

Help shape relationship meetings that work for you

These meetings are intended to be useful, focused and proportionate - not burdensome.

We want your input on areas such as:-

- Who should be involved from your organisation
- How often meetings would be helpful
- What processes you have in place to provide the MI
- What barriers or support needs we should understand

Your feedback will shape how the process works in practice.

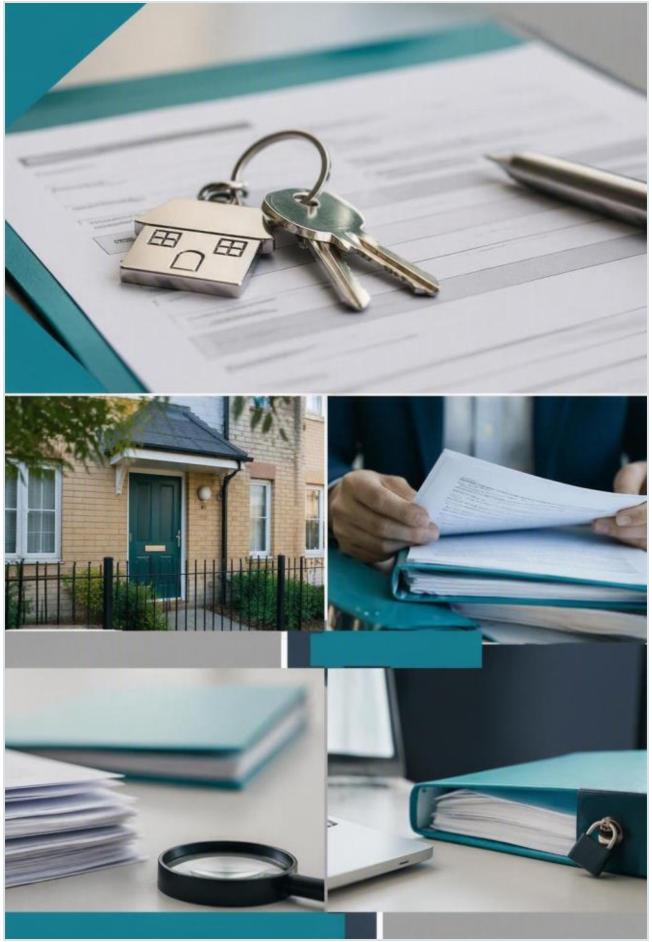
Recap — what you should now know

Do’s and don’ts for housing tenancy fraud referrals

- What matters should be referred to the Counter Fraud Team.
- Why quality referrals matter and how they get cases off to the right start.
- What good evidence looks like at the referral stage.
- The practical steps providers can take safely.
- The actions that can undermine evidence, compliance or future action.
- The common issues we are seeing and how to avoid them.
- How early engagement, structured information and joint working improve outcomes.
- How relationship meetings, MI and standard evidence packs can make referrals easier, more consistent and more useful.

MCC Counter Fraud Team – Referral Link and Key Contacts

Referrals should be submitted via the following link rather than sent to individual officers:
http://www.report-fraud.co.uk/manchestercity/28



Key contacts for the team

- Helen Smith: Audit and Assurance Manager Counter Fraud
  helen.smith@manchester.gov.uk / 07944 166408
- Chris Radford: Lead Auditor
  chris.Radford@manchester.gov.uk / 07814082387
- Lisa Mealor: Lead Auditor
  lisa.mealor@manchester.gov.uk / 07814082233