Compliance & Anti-Fraud Strategy
2014 – 2018

Department of Social Protection
April 2014
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Minister’s Foreword

In 2014, the Department of Social Protection will spend almost €20bn in social welfare payments and will provide income support to some 1.4 million people every week. We impact on the lives of almost every person in the State.

While I am acutely conscious that the vast majority of people are receiving what they are entitled to, nevertheless, as a society, we have to recognise that fraud and abuse of the welfare system is an ongoing reality which needs to be tackled across a number of fronts.

To protect the integrity of the system - and to ensure that we continue to target our scarce resources at those who most need them - nothing less is acceptable.

The new Compliance and Anti-Fraud Strategy 2014 – 2018 builds on the approach and progress made under the Fraud Initiative (2011 – 2013). The previous plan laid a very solid foundation for us to build on over the next couple of years. We go forward with a clear focus on the areas we need to concentrate on and what we need to continue to do. But, of course, we must remain alert to new and emerging forms of fraud and abuse and so our approach needs to be flexible and dynamic in terms of how it is structured.

The overall aims of the new Strategy are threefold:

• to stop fraud from entering the system in the first place;
• to increase the likelihood of finding incorrect or fraudulent claims and quickly correcting these; and
• to strengthen the sanctions for those who are caught.

These aims are key to underpinning an effective strategy to tackle fraud and abuse over the next 5 years. They are also key to giving strong assurances to taxpayers and, indeed Irish society generally, that the system of control that we operate is robust and effective.

The new Strategy contains a number of measures – some new and some of which are building on approaches that we have been successfully rolling out over the past couple of years. The Department is always open to looking at the role that technology can play in doing its business more efficiently. In this context, a key aspect of the new Strategy will be the use of analytics technology to predict which claims are more likely to be fraudulent. This will enable the Department to target higher risk cases for investigation and to do so faster. This approach will be rolled out across our main working age schemes before the end of 2014.

We will also be increasing our presence on the ground through the secondment of Gardaí to the Department’s Special Investigation Unit. These officers will retain their Garda powers and will undertake the full range of duties in detecting and investigating social welfare fraud.

Despite the encouraging signs of growth in the economy and the reduction in the numbers unemployed, the Department remains the biggest spending Department. We have to ensure, therefore, that the right person is paid the right amount of money at the right time. The new Strategy sets out our current and planned approaches to sustaining our efforts to vigorously combat fraud and abuse of the social welfare system over the next 5 years. This remains a key priority for the Department and for Government as a whole.

Joan Burton
Minister for Social Protection
April 2014
1.1 Overview: The Department of Social Protection has three functions:

- Delivery of income support and services;
- Activation of those of working age; and
- Control of fraud and abuse of the social welfare system.

While these functions are broadly co-equal, it is important that a balance is maintained between the three to ensure the integrity of the social welfare system from the perspective of all stakeholders. This Strategy concerns the area of fraud and abuse and sets out what is currently being done to minimise this and describes the current and planned approaches of the Department. The work in this area is dynamic, being a combination of reactive and proactive measures. The overall purpose of this document is to give assurance to all stakeholders and tax payers, in particular, that the system of control is robust. There is no contradiction between exercising control and delivering quality service as both are components of a good social welfare service.

1.2 A New Strategy for the period 2014 - 2018: The 2014 – 2018 Strategy will build on the approach and progress made under the previous Initiative which ran until the end of 2013.

An overview of the main measures under the Fraud Initiative 2011 - 2013 is outlined at Appendix 1. A key measure of control activity is the value of control savings achieved by the Department on an annual basis. Control savings are an estimate of the value of various control activities across schemes in payment. They represent the value of prevented expenditure over a future period that would have been incurred if investigative and control work had not been carried out.

During the lifetime of the previous Initiative, over €1.9bn in control savings was achieved. It provides, therefore, a very solid basis on which to work from for the new Strategy. The Strategy contains a number of measures – some new and some of which are building on approaches that we have been successfully rolling out over the past couple of years under the previous Initiative.

In developing the new Strategy, the Department is conscious that it processes in excess of 2 million applications each year and makes payments to some 1.4 million people every week. It is also aware that the vast majority of people who are supported by the Department are exercising their legitimate rights and receiving their appropriate entitlements.

On the other hand, social welfare fraud is sometimes perceived as a victimless crime but research demonstrates that it undermines public confidence in the entire social protection system as well as being unfair to other recipients of social welfare payments and to taxpayers.

1.3 The overriding objective of this Strategy is to ensure that the Department pays the right person the right amount of money at the right time. It is designed to ensure that the Department’s resources are targeted at – and are available for - the people who most need them.

1.4 Consultation on the New Strategy: To inform the development of the Strategy, an external and internal consultation process was undertaken.
1.5 **External consultation:** The Department invited comments and suggestions on the production of this Strategy from a range of external organisations and groups. Details of the organisations who responded to the Department’s request are detailed in Appendix 2. The sectors involved included:

- Other State agencies & Departments;
- The Voluntary Sector and Anti-Poverty Networks/Groups; and
- Members of the Hidden Economy Monitoring Group.

1.6 **Key Messages arising from consultation:** There is universal acceptance across all representative sectors that social welfare fraud is unacceptable and that the objective of paying the right person the right amount of money at the right time is a valid and correct one. Some of the key messages are:

- The vast majority of people who are supported by the Department are exercising their legitimate rights and receiving their appropriate entitlements;

- It is important that any discussion or messaging on social welfare fraud should ensure that recipients of social welfare are not stigmatised and portrayed in a negative light. Measures to address welfare fraud should be communicated carefully and factually;

- Under the new Strategy, the Department should put in place more effective systems to prevent overpayments in the first place;

- The hidden/shadow economy should be actively and rigorously policed; and

- The Public Services Card should be actively used to combat identity and welfare fraud.

1.7 **Consultation with Departmental Staff:** In formulating this Strategy, all staff within the organisation were also asked for comments and suggestions on how the Department should effectively manage and address the issue of social welfare fraud/ error. Some 300 suggestions were received.

1.8 A Departmental project team has been established to assist with the implementation of the new Strategy, taking account of the views expressed and good control practice.

1.9 **Measuring the Impact of the Strategy:** To measure the on-going progress and effectiveness of the new Strategy, the Department will publish an annual report and annual target statement by the end of the first quarter of each year during the lifetime of the Strategy. The targets set for 2014 across the various areas of activity are outlined in sections following and are also set out in the statement overleaf.
### Annual Target Statement – 2014

<table>
<thead>
<tr>
<th>Pillar</th>
<th>Area of Activity</th>
<th>Target</th>
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<tbody>
<tr>
<td>Prevention/Detection</td>
<td>Control Savings(^1) of which Special Investigation Unit (SIU)(^2) will achieve .....</td>
<td>€510m €70m</td>
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<td></td>
<td>Control Reviews</td>
<td>1m reviews to be conducted</td>
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<td></td>
<td>Predictive Analytics Modelling</td>
<td>In place for 3 main working age schemes by end 2014</td>
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<td></td>
<td>Fraud &amp; Error Surveys</td>
<td>Two surveys undertaken – Illness Benefit &amp; Invalidity Pension</td>
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<td></td>
<td>Public Service Cards issued</td>
<td>An additional 900,000 to be issued in 2014</td>
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<td></td>
<td>Additional resources to investigate social welfare fraud</td>
<td>20 Gardaí assigned to the SIU in the second half of 2014</td>
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<tr>
<td>Debt Recovery/ Deterrance</td>
<td>Overpayments recovered</td>
<td>€75m</td>
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<td></td>
<td>Prosecutions submitted</td>
<td>275</td>
</tr>
<tr>
<td></td>
<td>New debt management system</td>
<td>New system to ‘go live’ by the end of 2014</td>
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\(^1\) Control savings represent the value of prevented expenditure over a future period that would have been incurred if investigative and control work had not been carried out. The 2014 savings target of €510m has been adjusted downward to reflect improvements in recent years to address control risks, scheme changes and improved processes through automation which, overall, has led to improved controls. The 2013 outturn adjusted to reflect these changes would be €478m (as opposed to €632m).

\(^2\) The Special Investigation Unit’s exclusive function is to investigate social welfare fraud and non-compliance.
As outlined in section 1 above, the Strategy contains a number of measures – some of which are new and some of which are building on approaches that the Department has been successfully rolling out over the past few years under the previous Fraud Initiative. These are set out in more detail in the sections below.

In terms of new measures the Department will:

- Utilise predictive analytical techniques to enhance the methods currently in place to identify claims that are more likely to be fraudulent. This will mean that the Department will be able to target higher risk cases for investigation and to do so faster. The challenges of detecting and preventing fraud are intensifying with the growing sophistication of fraudsters’ strategies. There is a need, therefore, to use more advanced methods to combat fraud and in this context, the potential of predictive analytics modelling to enhance its existing control programme has been identified by the Department (see section 3.6 below).

- Enhance debt recovery through a new debt management system which will ‘go live’ by the end of 2014 (see section 4.2 below).

- Have a greater presence on the ground through the secondment of 20 Gardai to the Department’s Special Investigation Unit. These officers will increase the investigative capacity of the Department to prevent, detect and deter social welfare fraud (see section 5.3 below).

In addition, the Department will continue:

- To develop alliances with a range of enforcement and compliance agencies and to use an inter-agency approach to tackle fraud and abuse;

- To roll-out the Public Services Card to detect fraud, particularly identify fraud;

- To enhance our powers to recover overpayments with a view to maximising what we recover annually. In 2014, we propose to extend our notice of attachment powers to recover overpayments from other State payments, including tax refunds and redundancy payments;

- To target the shadow/hidden economy and sectors and individuals who have the potential to operate in it; and

- To carry out regular and systematic data matching with a range of external agencies with a view to identifying potential fraudulent cases.
Section 3: Preventing & Detecting Fraud

In the context of this Strategy, the Department’s emphasis is to minimise risks of fraud and eliminate incorrect payments. This involves appropriate checks at the point of claiming, strengthened by systematic reviews of claims in payment and verification that the conditions for entitlement continue to be met, including means, residency and medical reviews. Overall, it is vital that the Department continues to enhance its efforts to prevent fraud and error from entering the system in the first place.

In this regard the key actions for DSP will be to:

- Ensure our clients comprehensively understand their rights and responsibilities at the point of claim and for ongoing entitlement;
- Ensure our staff receive appropriate training to process claims correctly;
- Introduce predictive analytical modelling for the main working age schemes to enhance the Department’s overall review policies;
- Complete the roll out and further development of the Public Services Card to prevent fraud (see section 7);
- Enhance the level and effectiveness of data sharing to prevent social welfare fraud, consistent with Social Welfare and Data Protection legislation;
- Continue to publicise the fraud reporting hotline;
- Undertake at least two fraud and error surveys per year during the period of this Strategy to enable better risk categorisation of claims;
- Investigate social welfare fraud through the Special Investigation Unit/Joint Investigation Unit (SIU/JIU) and develop new control projects where appropriate (see section 5);
- Assign additional resources to investigate social welfare fraud through the secondment of Garda resources;
- Work jointly with other Government agencies to deal with the problem of the shadow/hidden economy (see section 6); and
- Continue to build and enhance our relationships at an international level to ensure we share ideas and best practice to combat fraud and error.

3.1. Service Users Rights & Responsibilities: Social welfare payments are a right and an entitlement for the people who qualify for them under the relevant conditions. They are often essential for people who are the most vulnerable in society or at a stage in their lives when they need support.

There should be a high level of awareness on the part of customers that correct identification and documentation will be required by the Department to process their claims in an efficient manner. They should also be aware that they may be subject to review at any stage during their claim. In particular, they should be aware that they should report any change in circumstances which may affect their claim or payments in a timely manner. The Department will review its own processes in this regard.

3.2 Public Services Card: The Public Services Card (PSC) has been introduced to enable individuals to gain access to public services more efficiently and with a minimum of duplication of effort, while at the same time preserving their privacy to the maximum extent possible.
The PSC is designed to replace other cards within the public sector such as the free travel pass and the Department’s social services card and to make it easy for providers of public services to verify the identity of customers.

The Card also provides a higher and enhanced level of assurance as to identity. It acts as a key tool in the prevention and detection of identity fraud. Identity fraud and identity theft are issues which public bodies are rightly concerned about, both in terms of prevention and detection.

Over 611,000 cards were issued by the end of 2013 and this included 125,000 PSC Free Travel Cards.

3.3. Data Protection: Information and data is critical to the business of the Department. It is vitally important that we maintain safeguards with regard to the confidentiality of customers’ personal data and ensure that it is processed for legitimate purposes and disclosed only where permissible by law.

In the context of this Strategy, the Department is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Acts 1988 and 2003.

3.4. Data Matching: The Department carries out data matching with external agencies to identify and target cases for review. These activities identify appropriate cases for referral to scheme areas and investigators.

The Government has specifically legislated for the sharing of data for the purpose of fraud and control. The legislative provisions are contained in section 261 of the Social Welfare Consolidation Act 2005, as amended. It provides that information held by another Government Department or a public body which is required for the purposes of the Act or the control of schemes may be transferred to the Department.

Notwithstanding the provisions of Section 261 of the Social Welfare Act, the Department must - and will - operate in accordance and in compliance with the principles underpinning the data protection legislation.

Customers can be assured that the Department has robust procedures and practices in place for the secure transmission of sensitive data to other bodies, for example ensuring data is encrypted.
3.5. Fraud and Error Surveys: The social welfare system is a contingency-based one, providing a range of benefits/allowances in respect of support for children, persons of working age, and older people. Across these contingencies the risk of fraud associated with particular schemes will differ according to the type of payment being claimed, with some schemes exhibiting higher levels of fraud and risk than others. The Department undertakes fraud and error surveys to establish the risk of fraud and error within social welfare schemes. This methodology is used by many other jurisdictions as a determinant of fraud risks. The process involves (i) inspectors reviewing a random sample of claims to assess the underlying levels of fraud and error and (ii) action being taken by scheme managers to address the fraud and error risks that are identified.

During the lifetime of the Fraud Initiative 2011-2013, the Department published four fraud & error surveys – Jobseeker’s Benefit, Disability Allowance, One Parent Family Payment and Child Benefit. The various recommendations from the surveys have been implemented by the relevant scheme areas.

Further surveys on Jobseeker’s Allowance, Widow/er’s, Surviving Civil Partner’s Contributory Pension and Rent Allowance are expected to be finalised and published in May 2014.

Case 1: Data Matching

**Background**
The Department in conjunction with Revenue has been developing new information and data exchanges to enhance the detection of fraud and control compliance. The legislative basis for the exchange of information between DSP and Revenue is contained in Section 261 of the Social Welfare Consolidation Act 2005.

In one such exchange, information was provided by Revenue on persons who had received interest on investments made and it was clear from the interest received that they had invested significant amounts of capital. This data was matched with Departmental records (i.e. means tested payments) and cases were referred for review where there was a possibility that means from financial savings had not been disclosed. In working age schemes (Jobseeker’s Allowance, One Family Parent and Disability Allowance) these cases were investigated by the Department’s Special Investigation Unit.

**Outcome**
A total of 941 case investigations have been concluded. These investigations have resulted in overpayments and the disallowance of social welfare payments to the value of €25.7 Million. Thus far, overpayments to the value of €9.54 Million have been recovered.

A number of cases detected arising from this project have and will be brought before the courts. In one case, an individual who was in receipt of Jobseeker’s Allowance was found to have significant assets held with financial institutions but had failed to declare these assets. Following further investigation, it was detected that he held close to €400,000 on deposit. The case was submitted for prosecution under Social Welfare legislation. The individual was convicted and fined €2,500 and received a 4 month’s suspended prison sentence. All monies overpaid, €30,000, were refunded in full to the Department and annual savings of just under €10,000 accrued.
During the course of this Strategy, the Department will undertake at least two fraud and error surveys per year. The schedule of surveys planned to be undertaken over the lifetime of the Strategy is set out at Appendix 3. The Department will continue to ensure that fraud and error surveys are conducted to the highest possible standards and that the results will be used to inform and enhance our scheme control and review policies.

3.6. Predictive Analytics:

In 2013, the Department reviewed approx. 1.1m claims across its various benefit and assistance schemes. Currently, it targets cases for review based on a number of factors, including reviews of means or income/earnings; data matching with other Departments and agencies; reviews following anonymous reports; address or identity checks; medical reviews and assessments and reviews of assets in estate cases.

While this approach has served us well in the past, the Department is keenly aware of the importance of continuing to enhance the systems and methods it employs to address the risk of non-compliance across its schemes. The challenges of detecting and preventing fraud are intensifying with the growing sophistication of fraudsters’ strategies. There is a need, therefore, to use more advanced methods to combat fraud and in this context, the potential of predictive analytics modelling to enhance the existing control programme has been identified.

In 2012/13, the Department concluded a predictive risk analytics pilot project which demonstrated that the detection of fraud and error could be enhanced through the application of predictive analytics technology and models.

Historical administrative data was used to build a model that predicted which cases were most likely to be non-compliant. The model demonstrated a 6.3% non-compliance detection rate in the cases identified. This was 40% better than the 4.5% “hit” rate arising from the case identification methods currently used by the Department to identify claims for investigation of potential overpayment of benefits.

Predictive analytics technology is already being used by many organisations to good effect - such as Revenue - where it forms the basis for their assessment of risk and compliance activity. Predictive analytic models allow for all data held by an organisation to be comprehensively analysed to indicate and predict where higher incidences or risks of fraud and error may occur.

A key issue for the Department is to enhance its ability to predict which claims are more likely to be non-compliant. This will enable the better targeting of investigative resources at higher risk and higher yield cases. Ultimately, this will also increase the return the Department will receive from investigations and will reduce overall social welfare expenditure. In addition, it will ensure that persons who are legitimately claiming social welfare payments are not subjected to unnecessary review.

The models to be developed will focus on existing clients and will provide a better risk profile of cases that merit review. Effectively, the models will identify - on the basis of risk scoring - what cases should be examined and reviewed by the Department across the different scheme areas.
While the investment required in this new technology is likely to be substantial, there are a number of key business benefits that will be achieved:

- Greater yields and outcomes from review activity and investigations;
- Reduced payment period of non-compliant claims;
- Optimised use of investigative and other resources; and
- Enhanced use of evidence-based approach to support and inform systematic review policies for scheme areas.

In setting control savings targets for 2015 – 2018, the Department will have regard to the outcomes being achieved through the application of the analytics models and annual targets will be adjusted accordingly.

The Department has a target of rolling out predictive analytics modelling across its main working age schemes (Jobseekers, One Parent Family Payment and Disability Allowance) by the end of 2014.

3.7. Channels for Fraud Reporting: The Department receives reports of possible fraud from members of the public in relation to the operation of its schemes. A dedicated phone number and a facility on the Department’s website are available for this purpose as follows:

- By email: www.welfare.ie
- By phone: (01) 6732123 or (071) 9672648 or Locall: 1890 927999.
- By post: Central Control Division, DSP, Shannon Lodge, Carrick-on-Shannon, Co Leitrim.

The number of calls has continued to rise steadily in recent years. For example, in 2013, the Department received over 24,700 calls. This compares to approx. 17,000 received in 2011.

It should be borne in mind, however, that while there is sometimes a perception of fraud, when a case is examined, the individual may, in fact, be doing something that is allowed under the rules of the particular payment that they are receiving. For example, a person can work and receive a One Parent Family Payment, provided the earnings are within the limits set for the scheme and the Department is aware of the situation. Overall, approximately 160,000 people work legitimately and are in receipt of some level of social welfare payment each week.

Nevertheless, the Department will continue to publicise the hotline and encourage members of the public to report suspected incidences of fraud.
Case 2: Report received from a member of the public

Background
The Department received a report from a member of the public to the effect that an individual who was in receipt of a Jobseeker’s payment was resident in Australia. The case was referred to the Department’s SIU for investigation. His home address was visited and he was found not to be resident there. Further enquiries established that he had in fact gone to Australia. His payment was immediately terminated.

Outcome
When he returned from Australia he was interviewed. He conceded that he was in Australia for the period of some of his claim and produced his passport which showed an entry stamp for Sydney Airport. His Jobseeker’s payment was disallowed for the period concerned for not being resident in the State and an overpayment was assessed and was fully recouped.
Section 4: Debt Recovery & Deterrence

Effective deterrence is necessary to ensure appropriate sanctions can be applied where fraud is discovered. Where an individual committing social welfare fraud thinks that the potential penalty or sanction is minimal, relative to the potential gain, then fraudulent activity will be encouraged and will most likely continue.

In this regard the Department will:

• Continue to implement its new powers to recover overpayments in a timelier manner;
• Develop a new Debt Management System which will support and enhance increased debt recovery; and
• Continue to prosecute cases where serious social welfare fraud has been detected.

The Department now conducts better targeted reviews. There are also more data matching exercises undertaken within the Department. The resultant success in terminating non-compliant claims and establishing a debt owing to the Department has resulted in greater levels of overpayments being recorded.

A social welfare debt will not become statute barred for recovery. Debt holders should be aware that a Departmental debt will remain on their records until fully recovered. This will result in a reduction of all future entitlements up to and including state pension. Following the death of a customer who owes a debt, the Department will have a claim on any estate remaining.

The objective, therefore, under this Strategy is, over time, to establish a situation whereby and where practicable:

• All debts are pursued and will remain on a debt holder’s record until they are fully recovered;
• The recovery of debt is an intrinsic part of the administration of social welfare schemes irrespective of the type of benefit/allowance on which the overpayment arose;

• An proactive debt recovery function is in place in each scheme, Intreo centre and community welfare service area;
• Upon awarding all new claims, the Department will examine the debt position of a customer and consider an appropriate recovery plan where there is an outstanding debt from a previous claim. Where there is an outstanding debt and the customer transfers from one payment to another, such overpayments will be actively pursued;
• Recovery action will also be pursued where customers, who have an outstanding debt, take up employment; and
• In general a debt will not be written off in cases where a debt holder is living, as recovery can be pursued up to future pension entitlements and, following death, where an estate remains.

4.1. Recovery of overpayments: Where there are payments which are fraudulent or paid in error in excess of entitlement, these will be stopped and overpayments will be assessed and recovered as quickly as possible.

In 2012, the Department introduced legislation which allows for up to 15% of a person’s social welfare entitlement to be deducted, without his/her written agreement, where he/she has an overpayment. Furthermore the Social Welfare and Pensions (Miscellaneous Provisions) Act 2013 provided for the use of attachment orders to recover overpayments in certain circumstances. To further enhance our powers to to recover overpayments, in 2014 the Department proposes to extend the notice of attachment powers to recover overpayments from other State payments. This includes tax refunds and redundancy payments.

These new powers will significantly improve the Department’s ability to recover from individuals who do not make reasonable efforts to repay their debt, having due regard to their financial circumstances. In 2012, just
over €53.3m was recovered in overpayments while the amount recovered in 2013 was approximately €70m.

In 2014, the Department has a target of recovering €75m in overpayments

4.2. New Debt Management System: The Department’s requirements in relation to debt management have evolved and expanded significantly in recent times, particularly with the enhancements in debt recovery legislation. During the course of this Strategy, the Department will develop a new system to maximise the efficiency and effectiveness of its debt management functions.

The new system will improve how the Department manages its overall debt management function and it will also deliver on requirements in relation to debt management, as identified by the Comptroller and Auditor General. Among the key features of the new system will be a robust and reliable debt and receipts accounting system, capacity to deal with all sources and types of internal and external debt, automated communication and reminder process for debtors and increased repayment options for debtors.

The Department is committed to having the new debt management system operational by the end of 2014.

4.3. Legal Proceedings & Prosecutions: Welfare fraud is not a victimless crime. It is unfair to persons who have legitimate entitlements and it is a crime against the taxpayer and the Exchequer.

Where the Department encounters serious fraud cases, it is the policy to ensure that such cases come before the courts. The Department can take such prosecutions under social welfare legislation but in cases where serious cases of identity fraud or multiple claiming occur, these are generally referred to the Gardaí for prosecution under criminal justice legislation.

In 2013, the Department submitted 266 cases for prosecution. This compares with 242 cases in 2012.

In 2014, the Department has a target of submitting 275 social welfare fraud cases for prosecution.

Case 3: Fraudulent encashment of Illness Benefit

Background
The case was detected arising from enquiries made by the Department’s SIU. The investigation related to an individual claiming Illness Benefit in the names of 3 persons who were not aware that this was being done. On completion of enquiries and given the serious nature of the fraud, the matter was referred to An Garda Síochana for their consideration of prosecuting the case under Criminal Justice legislation.

Outcome
The case was heard in the Circuit Court, where the individual pleaded guilty to 96 charges related to claiming Illness Benefit. A sentence of 3 years with 2.5 years suspended was imposed provided the person keeps the peace and repays all monies due within 18 months of release. Otherwise, the person will be before the court again to serve the remainder of the sentence.

On the charge of stealing the PPS Number of another person, a sentence of one year suspended was imposed, subject to the performance of 200 hours of community service.
## Case 4: Fraudulent encashment - Non Resident in the State

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<th>Background</th>
<th>Outcome</th>
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<tr>
<td>Arising from enquiries made by the Department’s SIU, evidence was adduced that an individual was permanently resident in the United Kingdom but returning to Ireland on a monthly basis to continue a Jobseeker’s claim. As part of the investigation, using powers provided under social welfare legislation, SIU officers observed the person concerned disembark at an airport. That day the individual certified and declared at a Local Office of the Department that he met and satisfied the conditions for receipt of payment. Further enquiries were made with the UK Department of Work &amp; Pensions which verified that the person was permanently resident in the UK. The case was referred to the Gardaí for consideration of prosecution. The individual was arrested by Gardaí when he returned to sign for Jobseeker’s Allowance the following month.</td>
<td>The case was heard at the Circuit Court and the individual was given a three-year suspended sentence. The person concerned admitted fraudulently claiming Jobseeker’s Allowance of more than €43,000. The Court was told that the individual was living in London and flew in to Ireland once a month to sign on. All monies were repaid.</td>
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Section 5: Department’s Special Investigation Unit

5.1. Overview & Objectives:
The Department’s Special Investigation Unit (SIU) comprises 91 officers. Its exclusive function is to investigate and report on social welfare fraud and non-compliance. Its remit involves a broad range of management, liaison, enforcement, investigative, intelligence gathering duties. The Unit carries out a wide range of control activities and projects. It also works closely with Revenue staff in the Joint Investigation Unit (JIU) and with other enforcement and compliance agencies. The key priorities of the Unit are to:

- Ensure a national and strategic response to high risk sectors and social welfare schemes where fraud and non-compliance is prevalent;
- Identify those sectors of the economy and conduct comprehensive investigations where the risk of concurrent working and claiming social welfare payments is most prevalent; and
- Undertake a series of targeted national projects aimed at the prevention and detection of social welfare fraud in high risk sectors, schemes and client cohorts;

Case 5: Joint DSP/Revenue Investigation

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<th>Background</th>
<th>Outcome</th>
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<tr>
<td>A Joint DSP/Revenue team carried out an operation on a tarmacadum and landscaping contractor at a particular location. This followed a period of observations on the site where work was being undertaken. It had been established that the contractor had not registered any employees. All three employees observed on this site were in receipt of social welfare payments.</td>
<td>Following interview, the individuals concerned admitted to concurrently working and claiming social welfare payments. Their social welfare and tax affairs were fully regularised following this joint investigation. Social welfare savings of €44,500 were made in the context of this operation from termination and cessation of social welfare payments.</td>
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The SIU, in undertaking social welfare fraud investigations, will continue to underpin its control activity within the three main pillars of the Department’s control strategy i.e. prevention, detection and deterrence. The emphasis of SIU activities is on direct intervention and engagement, with the Unit undertaking high visibility operations on a regular and systematic basis.
Case 6: Lifestyle & Assets - Joint DSP/Revenue Investigation

Background
As a result of a joint DSP/Revenue operation, a number of individuals were selected for investigation by the Joint Investigation Unit. Based on the investigations undertaken, it was evident that their lifestyle and assets were not commensurate with social welfare dependency. The cases investigated produced very high value outcomes and highlighted serious social welfare fraud, as well as the merits of the joint investigative approach between the Department and Revenue.

Outcome
Of the cases concluded, significant undisclosed assets were detected. This included property purchases made in cash and the purchase of land as well as significant undisclosed capital held in a variety of financial institutions. Savings of €235,000 have been achieved in 23 cases where social welfare payments were terminated.

5.2. Key Actions: Over the course of the Strategy, the following actions will be undertaken by the SIU:

- Planned control activity both on individual investigations and projectised activity (team-based) dealing with cases of social welfare fraud or PRSI non-compliance;
- A lead role in the investigation and detection of social welfare fraud where multiple identities are being used for the purposes of claiming social welfare payments or for the purposes of obtaining PPS numbers;
- Active investigation of cases of cross-border or trans-national social welfare fraud;
- Close and collaborative working with other compliance and fraud investigation agencies to ensure that social welfare fraud is comprehensively deterred and detected (e.g. Revenue, NERA, and Garda Síochána);
- Contribute to and participate in the High Level DSP/Revenue Group, the Hidden Economy Working Group and Regional Monitoring Groups; and
- In the context of the Department’s payments service contract with An Post, implement agreed fraud and control improvements to ensure the correct person is receiving the correct payment and that fraud and error is minimised.

Case 7: ‘Welfare Tourism’

Background
The Social Welfare Act 2012 made provision for social welfare inspectors to undertake power of enquiry at airports.

Outcome
In the period June 2012 to date there have been a total of 141 detections made in relation to social welfare fraud (‘welfare tourism’) as a result of direct activity in airports. The resultant Exchequer savings are in the region of €1.82 Million. There have been 6 cases prosecuted in the courts, with a further 4 cases referred to An Garda Síochána for consideration of prosecution.
Case 8: Multi Agency Vehicle Checks

**Background**
As part of a number of initiatives to detect and prevent fraud and abuse of the social welfare system, the Department participates in Multi Agency Vehicle Checks (MAVCs) on an ongoing basis. These are set up by An Garda Síochána and planned in consultation with other participating agencies. These MAVCs have been a feature for a number of years. They facilitate an approach whereby all agencies can comprehensively identify individuals engaged in vehicle tax evasion, road traffic irregularities or social welfare fraud in concentrated locations.

**Outcome**
In the period 2010 to 2013, there have been a total of 270 MAVCs where members of the Department’s SIU have participated. There have been a total of 319 direct detections arising from this activity, with resultant savings of €2.8 Million.

5.3. Secondment of Additional Garda Resources: There is a very good working relationship between the Department and An Garda Síochána. The SIU closely co-operates with them on an on-going basis in the context of multi-agency operations and investigations to combat social welfare fraud.

The secondment of 20 Gardaí to the SIU to assist with fraud investigation work is an important and innovative development and has been agreed by the Ministers of Social Protection and Justice and the Garda Commissioner. It is expected to take place during the second half of 2014.

It is envisaged that this secondment will be for a period of twelve months and that secondees will undertake the full range of investigative duties in detecting and combating social welfare fraud.

Whilst on secondment, Garda officers will retain Garda powers. The primary function of the Gardaí assigned to the SIU will be to assist the Unit to examine allegations and initiate investigations into social welfare fraud. Together with the SIU, these officers will be responsible for fraud investigations and ensuring that control activity is undertaken within the three main pillars of the Strategy - namely prevention, detection and deterrence.

In the main, it is expected that seconded officers will:

- collate and assemble suitable evidence to enable deciding officers to review an entitlement to social welfare payment and to use, in certain circumstances, in legal proceedings;
- work closely and collaboratively with other compliance and fraud investigation agencies to ensure that social welfare abuse is comprehensively deterred and detected;
- participate in operations such as Joint Investigation Unit operations with Revenue, the Taxi Regulator and the National Employment Rights Authority (NERA) as well as MAVCs; and
- in serious cases of identity fraud or multiple claiming of benefits/allowances, the Gardaí assigned to the Department will be actively engaged in the detection and prosecution of such cases.

There is also scope for them to be engaged in the investigation of social welfare fraud cases at ports and airports, as provided for in legislation.
The key benefits to be leveraged from the assignment of these resources include:

- Increased and additional investigative capacity and skills to prevent, detect and deter social welfare fraud;
- The ability to deal more efficiently with more serious cases of social welfare fraud and ensure that such cases are duly prosecuted;
- Increased capacity to deal with incidences of 'welfare tourism' and non-residency within the State; and
- Increased focus on and capacity to deal with shadow/hidden economy activity.

5.4. Interagency Co-operation: As part of its approach to the prevention and detection of social welfare fraud, the Department has formed alliances and developed mutual assistance agreements with a range of enforcement and compliance agencies. In particular, Departmental investigators work closely and collaboratively, on an ongoing basis, with other agencies to ensure that social welfare abuses are comprehensively deterred and detected (e.g. Revenue, NERA, Garda Síochána).

Under this Strategy, there will be a greater focus on inter-agency co-operation and an emphasis on undertaking joint projects and pooling of knowledge.

The Department has a target of having the 20 Garda officers assigned to the SIU in the second half of 2014

Case 9: Joint DSP/GNIB Operation

**Background**
DSP staff and officers from the Garda National Immigration Bureau (GNIB) carried out a joint late night operation to target fast food restaurants. The results demonstrated that the exercise was worthwhile.

**Outcomes**
- One employee had no valid identification and was arrested by GNIB;
- One employee was signing full-time and working since October 2013;
- Two employees were formerly on Jobseeker’s Allowance (JA) and when wages records were checked it was discovered that they had continued to receive JA for a period after they got work; and:
- A further 5 other persons were found to be on JA while working.
5.5. Cross Border/International Cooperation: Over the course of the Strategy, the Department will continue to develop and enhance cross-border and transnational structures and liaison to ensure that the Department and other social security agencies effectively co-operate to prevent and detect social security fraud across national boundaries. A number of measures are already employed by the Department when cross-border and transnational social security fraud is detected.

Interagency co-operation INIS and GNIB:

- The Department has an ongoing and developing relationship with the Irish National Immigration Service (INIS) and Garda National Immigration Bureau (GNIB). Two Departmental inspectors are assigned to the GNIB on a full-time basis. In the case of non EEA nationals who are deported by the GNIB, their records are checked by DSP personnel to ensure no social welfare allowances/benefit continue in payment.
- Case by case information exchanges and data-matching takes place between INIS / GNIB and DSP on a systematic basis.
- In the case of persons who are arrested and extradited on foot of European arrest warrants, details of these cases are provided to this Department to ensure benefits and allowances are discontinued.

Case No. 10 - Local Authority/DSP Operation

Background
A Local Authority Estate Management Unit made an official request to SIU, under Section 15 Housing (Miscellaneous Provisions) Act 1997, enquiring as to the address for a couple who had a property rented from the Local Authority. This enquiry led to a review of their payments. The Local Authority indicated that the claimant had been outside the State for some period of time. A SIU Inspector visited the address and it appeared to be vacant and unoccupied for some time. Enquiries made established that the couple were no longer resident in the State. This information was exchanged with the Local Authority and led to the repossession of the house.

Outcome
Savings of €36,000 accrued resulting from the cessation of these payments.
Case No. 11 - Transnational Co-operation (Identity Fraud)

**Background**
The assistance of the Dutch Social Security Agency (UWV) was instrumental in assisting the Department in detecting a serious case of social welfare fraud involving the use of a false identity. Contacts have been established with the UWV which allows for case by case transfer of information to help prevent and detect social security fraud. In this case, they verified and validated that the demographic details being used had been fraudulently obtained.

The person concerned had hijacked the identity of a Dutch national and produced a variety of false documents in support of claims and other transactions. Using false identity he claimed and was paid Jobseeker’s Allowance payments to the value of €82,000 and Rent Allowance to the value of €32,000.

**Outcome**
A joint Garda and SIU investigation resulted in a major detection of identity and welfare fraud. The individual was arrested by Gardaí and a file was prepared for consideration of prosecution by the DPP.

**UK/ NI Cross Border Co-operation:**

- There is a Memorandum of Understanding between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of Ireland concerning matters of mutual interest in the areas of fraud in their respective social security systems. In this regard, there are formal structures between the UK Department of Work & Pensions, the Northern Ireland Social Security Agency of the Department for Social Development and this Department which exercise oversight on issues of mutual co-operation.

- The Cross-Border Operational Forum comprises senior investigators from the relevant Departments, as outlined above, The Forum’s remit is to liaise at an operational level, under the aegis of the Memorandum of Understanding, and to ensure that measures are in place to ensure effective co-operation, prevention and detection of fraud.

- At an operational level, there is ongoing co-operation in both jurisdictions to assist the investigation of cross-jurisdictional fraud. Case-by-case information exchanges and data-matching takes places between the Department and the NISSA Northern Ireland and the UK Department of Work & Pensions on cases where social welfare fraud or abuse is occurring.

- There is an active and ongoing relationship between the Department’s SIU officers and their counterparts in the Fraud Investigation Service in Northern Ireland and Serious and Organised Fraud Branch in the UK Department of Work & Pensions.
Case 12: Cross Border Co-operation/Mutual Assistance

**Background**
This operation highlights the value of structured liaison and networks between DSP and the UK Department of Work & Pensions. Under the mutual assistance agreement and at the request of the Department of Work & Pensions (Serious Organised Fraud Unit), a joint investigation was undertaken.

The fraud involved an individual who had 11 fraudulent claims of various benefits and allowances in the UK. The identities being used related to 11 Irish citizens whose identities were hijacked for the purposes of fraudulently obtaining social security payments in the UK.

As part of the investigation, officers from the SIU took witness statements from the unsuspecting victims in Ireland whose identities had been used. This evidence formed a key element of the case for the prosecution. The case was heard in the Crown Court and the individual pleaded guilty.

**Outcome**
The case has been adjourned for sentencing. The savings to the Department of Work and Pensions are valued at £150,000.
6.1. Overview: There is no one internationally recognised and agreed measure of the so-called shadow/hidden economy. What is acknowledged is that the shadow/hidden economy and persons working in it are unfair on compliant businesses and citizens as it reduces the State’s ability to provide essential services. It reduces the State’s tax and duty revenues and impacts negatively on businesses, competitiveness, jobs and the long-term sustainability of legitimate enterprises.

The potential for shadow/hidden economy activity arises right across the various economic sectors and the Department must direct its focus and resources on sectors and activities which pose the greatest risk to the Exchequer. In the Department’s experience, and based on its operational activities, shadow economy activity is carried out by individuals who have a capacity to trade in cash, or who under-declare or suppress income from this source of activity. The shadow economy ranges from businesses understating their sales/income to getting paid in cash and paying employees in cash off-record. It also encompasses individuals doing “nixers”, in addition to their normal taxed employment or while concurrently working and claiming and not notifying the Department.

In the context of this Strategy, the Department will focus on sectors and individuals who have the potential to operate in this environment. It will adopt a multi-faceted approach and be assisted through enhanced multi-agency co-operation and, in particular, with Revenue.

Case 13: Monitoring Shadow Economy Activity

**Background**
In the context of undertaking investigations in the shadow economy, the Department in conjunction with Revenue, looks at emergent trends and sectors where shadow economic activity can occur. Operations are undertaken to establish the levels of compliance within such sectors.

A joint DSP/Revenue team focused on car wash and valeting services throughout a particular county. A total of 21 locations and businesses were visited to establish the level of compliance across both social welfare and tax codes.

**Outcomes**
There were three cases where both DSP/Revenue had issues with wages and other documentary records required to be maintained. In addition:

- Three entities were not registered for VAT;
- Six individuals were not registered for income tax;
- Four individuals were concurrently working and claiming social welfare payments; and
- Two cases were referred to the National Employment Rights Authority for further investigation with regard to employment rights issues.
6.2. Sectoral Approach: Where intelligence or reliable reports or evidence is received about persons engaged in concurrent working and claiming benefits and non-payment of tax as shadow economy workers, reviews of eligibility are immediately undertaken. The sectors where general inspections and operations will be undertaken over the period of the Strategy include:

- Cash businesses;
- Tourism & Hospitality;
- Private Security;
- Transport;
- Construction;
- Restaurants and fast food, including delivery services;
- Solid fuel merchants;
- Health and Nursing Homes; and
- Hairdressing.

Case 14: Shadow Economy - Joint Investigation in the Transport Sector

**Background**
A SIU operation targeting transport companies determined that certain companies were engaging casual drivers “off the books” and evading tax and PRSI thereby enabling the drivers to fraudulently claim social welfare payments. SIU received a ‘good citizen report’ from a member of the public concerning an individual who was in receipt of a social welfare payment while working casually. SIU staff carried out surveillance on the said company premises and determined that there were, in fact, four workers who were working as casual drivers while in receipt of social welfare payments. When the company was visited by DSP/Revenue JIU inspectors, it was co-operative and provided the details of earnings and start dates of the casual drivers. The company had been paying the workers with cheques made out to a local business with which they had an arrangement for the drivers to cash the cheques.

**Outcome**
All four were interviewed by SIU and most of them readily admitted that they were working. All four workers have been regularised with regard to taxes and PRSI and their social welfare payments. Revenue is investigating issues related to potentially fraudulent accounting by the employer and failure to register their employees.
6.3. Construction Sector: The Department will work collaboratively with the other key statutory compliance and enforcement agencies and the sectoral representative bodies in respect of the construction sector. In conjunction with Revenue and other compliance agencies, it is proposed to undertake high visibility site visits and inspections on construction sites where such projects are being publicly funded.

This project will examine contractors and employees engaged on sites and the emphasis will be towards public capital programmes. Specific risk criteria will be applied to those individuals and companies targeted for reviews. Inspections will also be conducted on once-off builds, using data from new building regulations to be operated by Local Authorities for planning permissions.

Case 15: Joint DSP/Revenue Operation

**Background**
Following information received by the SIU, work on a premises where roofing work was being undertaken was placed under observation. The site was monitored on a number of mornings and was visited by a team of DSP/Revenue JIU Inspectors. The contractor and employees were interviewed on site and it was found that all were on social welfare payments.

**Outcome**
As a result of the investigation, four Jobseeker Allowance payments, one Supplementary Welfare Allowance and one Rent Allowance payment were suspended.

6.4. Public Procurement: In conjunction with other compliance agencies, it is proposed to undertake site visits and inspections on companies where such contractors are working for public service agencies. The emphasis will be towards public agencies and specific risk criteria will be applied to those companies targeted for reviews.

6.5. Hidden Economy Monitoring Group:
The Hidden Economy Monitoring Group (HEMG) is a formal structure to monitor developments, share experiences and make proposals for combating the hidden economy. Chaired by the Revenue Commissioners, the Department is an active member of the statutory pillar which also includes the Department of Jobs, Enterprise and Innovation and the National Employment Rights Authority. On the non-statutory side, the Group’s membership also consists of Irish Business Employers’ Confederation, Small Firms Association, Construction Industry Federation and Irish Congress of Trades Unions.

6.6. Working with Business and Unions:
To inform the approaches we are taking and help determine where resources should best be deployed, the Department has engaged in a series of meetings with trade and representative bodies. Increasingly, the Department is finding that bodies and individuals are prepared to share insights and specific information with us with regard to shadow economy activity in times of recession. Representative bodies are increasingly conscious of the fact that their members are not operating on a level playing field with shadow economy operators who are gaining an unfair competitive advantage. The Department, during the course of this Strategy, will continue to develop its engagement with the representative bodies and organisations.
Section 7: Public Service Card

7.1. Overview: The Public Services Card (PSC) has been introduced to enable individuals gain access to public services more efficiently and with a minimum of duplication of effort, while at the same time preserving their privacy to the maximum extent possible.

The PSC is designed to replace other cards within the public sector and to make it easy for providers of public services to verify the identity of customers. The Card also provides a higher and enhanced level of assurance as to identity and acts as a key tool in the prevention and detection of identity fraud.

Over 611,000 cards were issued by the end of 2013 and this included 125,000 PSC Free Travel Cards. An additional 900,000 PSCs are to be issued in 2014.

Case 16: False Identities

Outcomes

At Ennis District Court, an individual was given a 3 month prison sentence for fraudulently obtaining €16,500 in social welfare payments whilst working under the assumed identity.

An individual was found guilty at Castlebar Circuit Court of fraudulently obtaining €14,000 in social welfare payments in the name of an individual who had left the jurisdiction.

7.2. Benefits: Coupled with the face-to-face registration process, the new PSC offers significant new protections against welfare fraud and also offers opportunities to expand its use across a broader range of public services. A number of benefits arise from the development of the PSC:

- It represents a robust identity registration process involving documentary examination, background database checks, face-to-face questioning, biometric capture and facial image matching which are usable by any public body to supplement or replace their own identity verification processes;

- It offers enhanced identity validation check at post offices at payment stage because of the photograph and signature held on the card. A person who holds a PSC does not need to provide any additional proof of their identity when collecting a social welfare payment at the post office. Through the inclusion of a photograph and signature and better security features, it also considerably reduces the potential for identity theft, forgery and fraudulent use; and

- It enhances the validation of Free Travel passes and can be used as a single card for social welfare claims and travel. It contains a photograph which prevents usage by ineligible persons and will also operate as a Leap Card when operators roll out systems and infrastructure.

- It can also be utilised by public bodies to enhance or replace existing identity registration/verification processes and tokens, e.g. Residence Permits, Age Cards, Travel Cards.
7.3. **Identity Fraud Detection**: To further strengthen the PSC registration process, the Department has acquired facial image matching software to help detect and deter duplicate registrations. This software has been operational on the Department’s IT systems since March 2013.

During the course of the registration process, the software performs a search of the captured or imported customer photograph against existing photographs on the Department’s database to ensure that the individual has not already been registered for a PSC using a different PPS number, or a different identity dataset. Where a match or a potential match is found, it is referred for further investigation.

Cases have been or are being referred to An Garda Síochána to initiate legal proceedings under Criminal Justice (Theft & Fraud Offences) legislation and a number of files have already been forwarded to the DPP.

7.4. **Key Actions - Development & roll out of Public Services Card**: During the period of this Strategy, the Department will continue the roll out and development of PSC. In this regard:

- Legislation introduced in 2013 allows for disqualification where a person fails to satisfy the Department as to his or her identity. The effect of this is that existing claimants for all schemes can be disqualified where they fail to authenticate their identity;
- Existing registration methods, including face-to-face registration, are being expanded in 2014 and additional registration centres will be introduced;
- In 2014 an additional postal registration process ‘Customer Certification’ is being introduced. It will be offered to 200,000 people over 66 years of age who are in receipt of a Departmental pension and paid at a post-office; and
- The Department has been working closely with the Road Safety Authority (RSA) in relation to the development of its registration model and discussions on the processes required for the sharing of data between the two organisations are at an advanced stage.

The Department has a target of issuing an additional 900,000 PSCs in 2014.
Section 8: Control Resources

8.1. Control of fraud and abuse of the social welfare system is one of the three key functions of the Department and all of the Department’s staff - be they involved in claim processing, activation work or reviewing entitlements - have a control function. This includes detecting cases of fraud and, in some cases, referring such cases to the SIU for investigation.

8.2 In terms of dedicated staff, there are over 900 officers as set out below:

- there are 91 officers in the Special Investigation Unit (SIU). The Unit’s exclusive function is to investigate and report on social welfare fraud and non-compliance. The Unit carries out a wide range of control activities and projects and also works closely with Revenue and other enforcement and compliance agencies.

- The Department also has approximately 290 social welfare inspectors and 460 community welfare service officers whose functions include reviewing entitlements to the various social welfare payments. While historically both roles have been separate, it is the Department’s intention to combine these roles and have these officers operating in a dual capacity. This work has already started and will continue to be progressed over the coming months.

8.3 In addition there are:

- 50 staff in the Department’s Control Unit in Carrick-on-Shannon dealing with a range of duties in relation to control policy, data matching, overpayments and debt management, fraud and error surveys and prosecutions; and

- 23 Medical Assessors who carry out medical review examinations, medical assessment examinations and desk reviews/assessments of medical reports in order to provide a second medical opinion for the guidance of Deciding and Appeals Officers. In general, they monitor all medical aspects of the Department’s sickness schemes.
Appendix 1: Overview - Fraud Initiative 2011 -2013

**Control Savings:**

During the lifetime of the Initiative (2011-2013), over €1.9bn in control savings was achieved.

**Fraud and Error Surveys:**

Four fraud and error surveys were published (Child Benefit, Jobseeker’s Benefit, One Parent Family Payment and Disability Allowance). These surveys highlight the risk of non-compliance with the rules of the schemes being surveyed at a particular point in time. The various recommendations from the surveys have been implemented by the relevant scheme areas.

**Public Services Card:**

Over 611,000 cards were issued by the end of 2013, including 125,000 PSC Free Travel Cards. As a further enhancement for fraud and control purposes, facial recognition software has been introduced to detect cases where multiple identities exist.

**Enhanced Legislation:**

In the context of the prevention and detection of social welfare fraud, a number of legislative provisions have been introduced to strengthen the Department’s capacity in this area. Successive SW Acts 2011 to 2013 have contained important and enhanced fraud and control measures.

**Data Matching:**

Systematic and regular data matching exercises on both internal systems and with external agencies are on-going.
Reporting Fraud and Abuse:

Anonymous or confidential reports are examined and where relevant, are referred for follow-up action. The breakdown of anonymous reports received in 2011 - 2013 is as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>16,917</td>
</tr>
<tr>
<td>2012</td>
<td>28,022</td>
</tr>
<tr>
<td>2013</td>
<td>24,720</td>
</tr>
</tbody>
</table>

Recovery of Overpayments:

The Department is proactively targeting persons with overpayments to ensure all persons who have a social welfare overpayment are making a contribution towards the repayment of the debt outstanding. The Social Welfare Act 2012 included a provision to increase the recovery amount from individuals who have a social welfare debt and are in receipt of a payment from the Department.

In addition the Social Welfare and Pensions (Miscellaneous Provisions) Act 2013 Order 2013 introduced additional powers for the recovery of social welfare overpayments by way of notice of attachment to earnings and money held by an overpaid person in a financial institution.

Prosecutions:

It is the Department’s policy to consider for prosecution cases of fraud against the social welfare system. The following number of cases were forwarded for prosecution during 2011-2013:

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Cases Submitted to CCSO</th>
<th>Referred Gardai</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>207</td>
<td>174</td>
</tr>
<tr>
<td>2012</td>
<td>158</td>
<td>84</td>
</tr>
<tr>
<td>2013</td>
<td>198</td>
<td>68</td>
</tr>
</tbody>
</table>

Predictive Risk Analytics Project:

In line with commitments in the Fraud Initiative 2011-2013, the Department recognises that fraud investigation and control can be assisted through the application of a range of new technologies. The Department concluded a pilot predictive risk analytics project. This pilot established fraud investigation and control outcomes could be enhanced through the application of this analytics models.
### Appendix 2: Submissions received

<table>
<thead>
<tr>
<th>State Agencies</th>
<th>Hidden Economy Monitoring Group</th>
<th>Voluntary Sector &amp; Anti-Poverty networks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revenue Commissioners</td>
<td>Irish Business Employer’s Conference</td>
<td>Irish National Organisation for the Unemployed</td>
</tr>
<tr>
<td>National Employment Rights Agency</td>
<td>Small Firms Association</td>
<td>Free Legal Aid Centre</td>
</tr>
<tr>
<td>Department of Justice</td>
<td>Irish Small and Medium Enterprise</td>
<td>EAPN (European Anti-Poverty Network) Ireland *</td>
</tr>
<tr>
<td>Irish National Immigration Service</td>
<td>Retail, Grocery, Dairy &amp; Allied Trades Association</td>
<td>Disability Federation of Ireland</td>
</tr>
<tr>
<td>Án Garda Síochána</td>
<td>Irish Congress of Trade Unions</td>
<td>St Vincent de Paul</td>
</tr>
<tr>
<td>Department of Enterprise Jobs &amp; Innovation</td>
<td>Retail Ireland</td>
<td>One Family</td>
</tr>
<tr>
<td>Road Safety Authority</td>
<td>Construction Industry Federation</td>
<td>Focus Ireland</td>
</tr>
<tr>
<td>Private Security Agency</td>
<td>Hardware Association Ireland</td>
<td></td>
</tr>
<tr>
<td>National Transport Authority</td>
<td></td>
<td></td>
</tr>
<tr>
<td>An Post</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* EAPN (European Anti-Poverty Network) Ireland Europe 2020 Working Group, representing:

- Age Action Ireland
- Congress Centres Network
- Disability Federation of Ireland
- EAPN Ireland
- Irish National Organisation of the Unemployed
- Irish Traveller Movement
- Migrant Rights Centre Ireland
- National Youth Council of Ireland
- National Women’s Council of Ireland
- One Family
- OPEN Network of Lone Parents’ organisations
- SIPTU

### Appendix 3: Schedule of Fraud and Error Surveys 2014 – 2018

<table>
<thead>
<tr>
<th>Year</th>
<th>Scheme</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>Illness Benefit</td>
</tr>
<tr>
<td></td>
<td>Invalidity Pension</td>
</tr>
<tr>
<td>2015</td>
<td>Carers Allowance</td>
</tr>
<tr>
<td></td>
<td>Free Schemes</td>
</tr>
<tr>
<td></td>
<td>FIS</td>
</tr>
<tr>
<td>2016</td>
<td>Farm Assist</td>
</tr>
<tr>
<td></td>
<td>SWA</td>
</tr>
<tr>
<td></td>
<td>State Pension Contributory</td>
</tr>
<tr>
<td>2017</td>
<td>State Pension Non Con</td>
</tr>
<tr>
<td></td>
<td>Back to Work Allowance</td>
</tr>
<tr>
<td>2018</td>
<td>Disability Allowance</td>
</tr>
<tr>
<td></td>
<td>One Parent Family Payment</td>
</tr>
</tbody>
</table>