

03 Initial Customer Compliance action

Check the relevant IT systems

1. Perform an in depth interrogation of the circumstances of the claimant's claim to benefit. Check relevant IT systems, for example:
 - Income Support Computer System (ISCS),
 - Jobseekers Allowance Payment System (JSAPS),
 - Disability and Carers Service (DCS) / Personal Independence Payment (PIP) benefits, via the Common Enquiry System (CES),
 - the Customer Information System (CIS) including entry to Tax Credit information for those with access,
 - Labour Market System (LMS), and
 - other Departmental IT systems, e.g. National Insurance Pay as You Earn System (NPS), which was formally called e-Nirs, for those with access. After accessing NPS it may be necessary to obtain additional information, such as the full name and address of the employer, from Her Majesty's Revenue and Customs (HMRC).

Other Checks

2. Check the following information on the FRAIMS Contact Screen:
 - the claimant is still in receipt of benefit,
 - the alleged offence/risk would have an impact on the type of benefit that the claimant is claiming,
 - the claimant's circumstances have not changed,
 - for special circumstances such as Appointee or Power of Attorney, and
 - for Potentially Violent (PV)/Unacceptable Customer Behaviour (UCB) indicators.

Note: That the above list is not exhaustive.

3. Check legacy systems to ensure that details of the allegation have not already been reported and dealt with by the benefit centre, if the change of circumstances has already been reported consider abandoning the case.
4. If the Case has been downgraded from Fraud Investigation Service or is a MIDAS referral, check details of the Offence Type displayed on the FRAIMS case and if required take action to change the Offence Type.
5. The Customer Compliance Support Office (CCSO) must also check that any material received that is sensitive is marked in red. Most documents will have been marked before they reach Customer Compliance, however a check must be completed and documents marked if they need to be.
6. When the checks identifies that Disability Living Allowance (DLA), Personal Independence Payment (PIP) and/or Carers Allowance (CA) is in payment, a DCS/PIP claim pack can be requested by associating the case to the Fraud Investigation Service Disability and Carers Team (FIS DCT) Manager on FRAIMS.
7. Record that Customer Compliance activity has commenced on the appropriate benefit payment system, for example JSAPS or ISCS by recording the following on Notepad:

“Case selected for compliance activity on (insert today’s date). Do not delete until (insert 14 months date). FRF/GMS concerning (insert details of activity)”.

The date of the interview can be added to this note, if known.

Obtaining Employer Information from HMRC

8. If, after accessing National Insurance Pay as You Earn System (NPS), employer information is required from HMRC it will be necessary for the Customer Compliance Officer (CCO) to download, complete and issue the following forms:
 - MF67 (for tax years from 2004/05), and/or
 - MF67A (for tax years prior to 2004/05) to HMRC.
9. A separate form must be used for each individual claimant but up to five requests, which could be for more than one employer or tax year, can be made on the same form by using the tabs at the bottom of the template. The claimant details must be completed in full but are only required to be entered on the first page as this information will be automatically populated to all the pages.
10. The employer checkbrick name and/or reference number, along with the Total primary Cont/value are obtained from the appropriate NPS screen. Occasionally on cases from 2004/05 onwards, a microfilm number may be present on NPS. Form MF67 should still be used on these cases and e mailed to HMRC CKU, however the microfilm number should not be entered on the form.
11. For tax years prior to 2004/05 form MF67A must be sent by email to the HMRC MRS team via the designated GSI inbox at: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx. The responses from the CKU team will be completed clerically and returned via the courier service.
12. For tax years 2004/05 and later, form MF67 must be sent by email to the HMRC xxx team via the designated GSI inbox at: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx. The CKU team will provide the employer information by way of screen shots attached to the original email request.
13. For further information on the completion of these forms, see:
 - E-MF67 Instructions,
 - E-MF67A Instructions.

Email subject box for HMRC requests

14. In order to comply with the Departmental Security Policy for the transmission of documents, the subject box on the email for all HMRC requests must be marked ‘RESTRICTED’ and include the claimant’s name followed by the number of requests: for example: “RESTRICTED – M. Bloggs x 4”.

Recording issue of MF67 or MF67A

15. The issue of form MF67 or MF67A must be recorded in FRAIMS as an outbound Communication Activity, setting an appropriate Due Date for the response.

Action on receipt of information from HMRC

16. Update the activity to record that the replay has been received and attached the reply document to the activity.

Member of Staff Implicated

17. If a member of staff is implicated in any way during the course of Customer Compliance action, the case must be routed to the Risk Assurance Division (RAD) Single Point Of contact (SPOC) for the case to be categorised as sensitive or not. If categorised as non-sensitive, it will be returned to Customer Compliance for continued action to be taken on the referral.
18. Fraud investigation Service (FIS) receive all cases regarded as sensitive for a benefit fraud investigation. Sensitive cases are not downgraded to Customer Compliance.

Check that Customer Compliance activity is appropriate

19. If checks establish that the claimant is no longer in receipt of a benefit, or the criteria for the case to be abandoned are met, consider if Customer Compliance activity is still appropriate.
20. Consider whether the claimant needs to be contacted, for example; it might be appropriate to contact the claimant when they persistently re-claim benefit in between working and we have a suspicion that they continue to work whilst in receipt of benefit. The contact with the claimant will reinforce their responsibilities whilst in receipt of benefit.

Customer Compliance activity is still appropriate

21. If the claimant is not in receipt of a benefit but Customer Compliance activity is still appropriate, including cases transferred (downgraded) by FIS or from the Benefit Integrity Centre (BIC), the Customer Compliance Officer (CCO) must take the following action:

Step	Action
1	Contact the claimant by issuing the CCEL1 / CCEL1W outlining any irregularities found and request further details.
2	Show the contact with the claimant by creating an activity on the FRAIMS case, and: <ul style="list-style-type: none">• record details of the letter issued and the date sent, and• set a BF date to allow the claimant 14 calendar days to respond,• record the Activity Sub-Category as 'Telephone'..
3	If the claimant has not replied within 10 working days, create an activity to refer the details to the Decision Maker (DM).
4	Complete the LT54 outlining the details of the case to enable the DM to make either reassess the benefit or make a decision on the benefit entitlement. See Post Interview Actions.

Customer Compliance activity is no longer appropriate

22. If Customer Compliance activity is no longer appropriate take the following action:

Step	Action
1	Record the outcome of the case on FRAIMS using one of the categories available and take case closure action on FRAIMS.
2	Note the appropriate benefit payment system for any relevant action to be taken if the claimant re-claims benefit; and
3	File the documents in accordance with local filing arrangements. These should be treated as supporting documents and retained for the same period as benefit documentation, e.g. documents should be destroyed 14 months after benefit entitlement ends (subject to the claim being an exception case). If your office does not retain Customer Compliance documents, send the Customer Compliance documents as Non Associated Post (NAP) to the relevant benefit parent file at Heywood.

23. For more information, see The Benefits Document and Data Retention Guide.

Review the Customer Compliance case

24. Prior to deciding the method of activity the Customer Compliance Support Manager (CCSM) may wish to review the case to check that the relevant information is recorded on the Fraud Referral Form.

Decide the method of intervention and allocate the case

25. There are a number of methods of intervention the CCSM can choose for each case:

- office interview,
- visit,
- post – If the claimant is not in receipt of a benefit but Customer Compliance activity is still appropriate,
- telephone - If the claimant contacts the office prior to the interview.

26. Office interviews should always be the preferred method, dependant on room availability and the claimant's personal circumstances.

27. Cases can be viewed and allocated to a Customer Compliance Officer (CCO) on FRAIMS, taking into account their workload and experience.

Pre-award of benefit to the claimant

28. Cases that are referred under Risk A (New Claims) Pre-payment Living Together As Husband And Wife/Civil Partnership (LTAHAW/CP) require a face to face interview if the claimant wishes to pursue entitlement.

Potential Living Together/Civil Partnership cases

29. Living Together As Husband And Wife/Civil Partnership (LTAHAW/CP) cases will be received under Risks A and B where another person has been declared in the household.

30. Customer Compliance Officers (CCOs) will also receive cases from Fraud Investigation Service (FIS) where there is an alleged partner in the household.
31. If both the claimant and the alleged partner are receiving Department for Work and Pensions (DWP) paid benefits, a case should be raised for each person on FRAIMS, as an outcome may be appropriate on each case.
32. Where possible, interview both the claimant and the alleged partner.
33. Only complete a CP2LT if the claimant admits that a member of the opposite or same sex is a member of the household but denies that a Living Together situation exists.
34. If the claimant denies that the alleged partner is in the household but the CCO has new and substantial information, complete a Fraud Referral Form (FRF).
35. If a potential overpayment is identified obtain full details from the claimant regarding the period of the overpayment and any agreement to repay. It is not necessary to specify any amount of the overpayment. Include this information in the MF47 statement.

Arrange the interview

36. Prepayment interviews and visits must take place within 5 working days of date of receipt by Customer Compliance. The Advisor will have already told the claimant that a visit will be undertaken.
37. All other office or home appointments should be notified in writing and must be a minimum of 14 calendar days in the future, but see 'Arranging short notice visit appointments'

Office Interviews

38. Try to arrange the Customer Compliance interview to coincide with their Fortnightly Jobsearch Review if they are a Jobseekers Allowance (JSA) claimant. Check if there is an outstanding interview with another part of Jobcentre Plus, for example, a Personal Adviser (PA).
39. Where a Labour Market System (LMS) account already exists, note LMS Conversations that a Customer Compliance interview has been arranged, along with the interview date and time. For more information, see Appointment Booking System – ABS Interview Types, sub-heading 'Benefit Related'.

Home Visits

40. Take into account the number of visits and the geographical area being visited by the CCO.
41. If it is a prepayment visit, the claimant should be notified if possible by telephone due to the urgency of the visit, to arrange a suitable time and day. Only notify the claimant for this type of visit in writing if they cannot be contacted by telephone.
42. Where the CCO has already notified a number of visits to a particular area, but following the initial notification being issued, they have gaps in their day, for example claimants may have notified they will not be available to be visited, it may be appropriate to contact claimants by telephone to

arrange to see them at short notice, see 'Arranging a short notice visit appointments'.

Arranging the interview/home visit

43. Confirm the availability of the Customer Compliance Officer (CCO) using local diary arrangements.
44. The appointment date must be a minimum of 14 calendar days in the future, but see 'Arranging short notice visit appointments'.
45. Locate the claimant's mobile telephone number and create the SMS text message and schedule the text message for the day before the interview date. This step is not required if a mobile telephone number cannot be located.
46. Record details of the planned interview/home visit by creating an activity on FRAIMS ensuring a B/F date is set the day before the scheduled interview date, so that the SMS text message schedule can be checked,.
47. Complete and send the appropriate:
 - CCOI1 / CCOI1W – for office interviews,
 - CCV1 / CCV1W – for home visits.
48. Record the issue of the letter on the FRAIMS interview/visit activity.
49. For more information on creating the interview/visit activity.
50. Pass the case to the CCO if the above action was undertaken by someone other than the CCO.

Un-notified visits

51. Taking into account Article 8 of the Human Rights Act, un-notified visits may only be conducted on Risk A (Pre-payment Living Together As Husband And Wife/Civil Partnership (LTAHAW/CP) cases, identified at the gateway where the Financial Assessor has told the claimant we will be visiting them.
52. Prior to the visit full justification by the CCO must be documented detailing why the visit was un-notified. Record details of the un-notified visit on FRAIMS.
53. The Customer Compliance Manager (CCM) may wish to perform a management check on all un-notified visits.

SMS Text Messaging

54. A SMS text message should be sent to the claimant in advance of the scheduled interview to remind them of the date and time to attend.
55. Standard messages for Customer Compliance in English and Welsh have been provided and no changes or additions to these messages are to be made.
56. Examples of the SMS text wording is shown below:

English:

This is to remind you of your appointment at <venue> ('Your home' or 'XXX jobcentre') on <date> <at or between><Time>. If you have any problems please call <insert local compliance team number>.

Welsh:

Mae hyn i'ch atgoffa y bydd eich apwyntiad yn <venue> ('Your home' or 'XXX jobcentre') ar <date> <at or rhwng><Time>. Os oes gennych unrhyw broblemau ffoniwch <insert local compliance team number>.

Note: Where we use 'Your home', these will be the actual words used in the text message, not the customer's address.

57. For guidance on how to create a message and schedule it for delivery, see 5. How to send a message.
58. For further information about the Rapide SMS text messaging service, see SMS Homepage.

Arranging short notice visit appointments

59. When making the initial telephone call the CCO must ensure they speak to the claimant only and establish their identity using random security questions.
60. If a message is to be left on the claimant's answerphone, follow the guidance in 'Leaving a messages on a Claimant's answerphone'.
61. When claimant's identity has been established, advise the reason for the call and ask if the claimant will be available to be visited.
62. If the claimant states they will be available, explain the reason for the visit and tell the claimant what information / evidence they must have available for the visit. They must have available:

Evidence of their identity

- Passport,
- driving licence,
- any of the following, which must show their current name and address
 - utility bill,
 - rent agreement
 - bank statement.

Other documents

- Bank Statements; for any current accounts, deposit accounts, or any bank/building society or Post Office accounts,
 - Occupational Pension(s); their most recent statement from the pension provider or details of other money from a place where their or their partner used to work,
 - Earnings, including their most recent wage slips,
 - Individual Savings Accounts (ISAs), Personal Equity Plans (PEPs) statements,
 - Savings and Investments; such as National Savings Certificates, Premium Bonds, Income Bonds, or Capital Bonds,
 - Details of any property or land, other than where they live,
 - Evidence of their Immigration Status and 'Right to Remain'.
63. If the claimant states they will not be available for the visit, or they cannot obtain the necessary documentation in time for the visit, tell the claimant that an appointment letter will be issued to arrange a later visit date, and warn the claimant that they must be available for this visit.

64. Record details of the telephone call and the visit arrangements on the FRAIMS case.
65. If the claimant does not answer or is unavailable either to take the call or for the visit, details of the call must still be recorded on FRAIMS.

Interview preparation

66. The CCO must preview the case prior to the interview. As a minimum, check relevant IT systems and review the most up to date details concerning the claimant held on the Departmental benefit systems, for example:
 - whether the claimant still has conditions of entitlement,
 - who lives at the claimant's address,
 - confirm no official errors have been made.
67. If the claimant is suspected of working whilst in receipt of benefit and we know the name of the employer they cannot be contacted until we have interviewed the claimant. This is because the enquiry is being made for non-benefit offence purposes and Section 111 of the Social Security Administration Act 1992 is not appropriate. See Contacting the employer.
68. Identify any sensitive material prior to the interview and remove it from the file. Sensitive material must not be disclosed to the claimant. Complete the Sensitive Information record sheet (RM7) confirming that the check has been completed.
69. If a case has been notified for a Customer Compliance interview and is subsequently chosen for a Performance Measurement visit, continue with Customer Compliance activity and interview the claimant. The Performance Measurement team will identify this activity when they preview the case and see the reference in 'Notepad' to Customer Compliance action.
70. If the claimant has not been notified of a Customer Compliance interview and is chosen for a Performance Measurement interview, Customer Compliance activity must stop. Note FRAIMS accordingly by creating an activity and then close the case when all details have been completed.
71. If the case notes suggest an interpreter is required, one should be arranged.

Receipt pad

72. The CCO must have an FF300 receipt pad in the event that a bank book is obtained from the claimant and a receipt is to be issued. This can be obtained from the Finance Officer.

Identity card

73. The CCO must have a valid identity card EF283/EF283W, which must not be a Fraud Investigation Service identity card. This must be shown to all claimants who are being interviewed outside of the office. For office interviews, an identity card, or Jobcentre Plus name badge can be used.
74. If the Customer Compliance Manager (CCM) or other authorised person intends to accompany a CCO on a visit they must also have a valid identity card to show to the claimant.

75. For more information, see the Finance Managers Guide.

Contact from the Claimant

Contact to cancel or re-arrange the appointment

- 76. The claimant may telephone the office on receipt of the appointment letter. If the claimant cannot attend the arranged interview the CCO must re-arrange the appointment at a convenient time and place for both parties.
- 77. If the appointment is re-arranged, the reason given for not attending must be recorded on the existing FRAIMS interview/visit activity and a new interview/visit activity created.
- 78. The existing FRAIMS activity details must not be over-written with the new appointment time/date.
- 79. Ensure the SMS text message is updated to show the new appointment details.
- 80. Where appropriate, revise LMS notes to add details of the change of appointment date and/or time.

JSA Claimants

- 81. As a minimum, arrange to record the reason why the claimant cannot attend the interview/visit in LMS conversations.

Contact to report a change of circumstances

- 82. In order for the CCO to claim a successful outcome the claimant must contact the Department to report a pre-existing change of circumstances, preferably the Customer Compliance Team, although this is not essential, to enable them to complete the required CC activity.
- 83. If the claimant reports the change to the CCO and the only way to resolve the case is to discuss the circumstances over the telephone, for example: if the claimant has started full-time employment and cannot attend a customer compliance interview, a full review including the completion of a MF47 must be carried out by the CCO in order to claim a Monetary Value of Adjustment (MVA).
- 84. The change must have occurred on or before the day this review takes place. See Interview conducted by telephone for guidance on how to conduct Customer Compliance interviews over the telephone.
- 85. If the change is reported to someone other than the CCO, a MVA can only be claimed if, following the issue of the letter from Customer Compliance inviting the claimant for interview, they contact to report a change which occurred on, or prior to the date the letter was issued.
- 86. If the claimant reports a future change, a successful outcome cannot be claimed.
- 87. The contact from the claimant must be recorded on the FRAIMS case. At this point the claimant can, if they choose to, waive the 3 day minimum notification period, in order to have an earlier interview.

Safety of staff whilst visiting

88. The Customer Compliance Manager (CCM) must ensure that appropriate health & safety guidance has been followed prior to the allocation of any visits to claimants. Instructions can be found in the following guidance:

- Keeping Safe – Travelling and Working Off-Site,
- Working away from the office – a Health & Safety framework for managers,
- Risk Assessment for DWP persons involved with visiting customers in their homes.