

SLOUGH BOROUGH COUNCIL

Report to:	Audit and Corporate Governance Committee
Date:	30 April 2025
Subject:	Report of the progress of the Corporate Fraud Team in 2024/2025
Chief Officer:	Annabel Scholes Executive Director Corporate Resources (S151)
Contact Officer:	Ian Kirby Head of Internal Audit Lyn Davies, Corporate Fraud Manager
Wards affected:	All
Exempt:	No
Appendices:	Appendix 1 Annual Outcomes report 2024/025 Appendix 2 Corporate Fraud Enquiries report 2024/2025 Appendix 3 Social Housing Report 2024/2025 Appendix 4 ARIS Report 2024/2025 Appendix 5 Initial NFI report 2024/2025 Appendix 6 Annual Operational Plan 2025/2026

1. Purpose of Report

- 1.1 The Corporate Fraud Team (CFT) has evolved over the last year with the appointment of 2 permanent Housing Investigation Officers. The team as a whole will look to undertake a pro-active approach to prevention, detection and recovery over the coming months.

The CFT supports the Council in meeting its statutory responsibility under section 151 of the Local Government Act 1972 for the prevention and detection of fraud and corruption. The work of the CFT underpins the Council's commitment to a zero-tolerance approach to fraud, bribery, corruption, and other irregularities, including any money laundering activity.

The CFT works closely with SBC and its partners to prevent, detect, and investigate allegations of fraud and corruption occurring within and/or against the authority. An Anti-Fraud and Corruption Response Plan has been developed to ensure that members and employees know what action to take should they become aware of or suspect fraud or corruption.

The team works on a range of high-risk areas that include, but are not limited to:

- Social Housing Fraud
- Right to Buy Fraud
- Council Tax Fraud
- Housing Tenancy Fraud
- Corporate and Internal Fraud
- Financial Investigations; Proceeds of Crime (POCA)
- Social Care

Key Highlights

- Continued partnership with Suffolk and Oxford Councils to carry out financial investigations (POCA) and a new partnership with Cherwell District Council.

- Successful prosecutions: A case where false details had been provided by an external fraudster in order to divert the pay of a member of staff.
- The second case revolves around applications being made for various Covid support grants provided by SBC for local businesses during the Covid response given restrictions placed upon businesses in 2020 and 2021. In short to take advantage of the grant schemes made available to small businesses during the pandemic and the use of false documents being used to support the fraudulent applications.
- Participation in New Homes Bonus initiative added £246,238.16 (after costs) to the amount paid in the grant received from Central Government
- Successful qualification of the 2 Housing Investigation Officers achieving The Professional Certificate in Investigations.

2. **Recommendations**

- 2.1 The Committee is recommended to consider, comment and note the contents of this report.

Commissioner Review

This report is outside the scope for pre-publication commissioner review; please check the [Commissioners' instruction 5 to CLT to sign off papers](#) for further details.

3. **Background**

- 3.1 The purpose of this report is to provide the members of the Audit and Corporate Governance Committee with an update of the work of the CFT towards preventing, detecting, and investigating fraud against the Council during the operational year 2024/2025.

4. **Counter Fraud Activity**

- 4.1 The CFT is responsible for undertaking proactive anti-fraud work and investigating fraud committed against the Council by members of the public, Council officers, members, suppliers or contractors.

Prevention of fraud is the key part of our strategy, and we strive to prevent fraud from being committed at the outset. We seek to prosecute and take action to recover any proceeds of crime. We want our residents, suppliers, and the public to know that fraud perpetrated against Slough Borough Council does not pay.

The CFT is continuing to move from reacting to fraud by investigating cases as referred, to taking a proactive stance to prevent fraud from occurring in the first place. The team aims to build further on this with a view to embedding this ethos to become part of business-as-usual processes across the council.

The CFT has established three key areas of work:

- **Reactive** – work which focuses on investigating and pursuing those who commit fraud against the council. An essential part of the investigation, this work will continue, but increasingly we will work to try to prevent fraud.
- **Proactive** – work which focuses on the identification, deterrence, and prevention of fraud, by further increasing our work with management to build tools into existing processes, develop services to help them undertake checks, increase risk-based monitoring to focus on fraud risks, and to make sure they know where and how to report fraud.
- **Redress** – work which focuses on the maximum recovery of loss including through the proceeds of crime.

The combined work of these areas helps protect the Council's resources for those with a genuine need.

The CFT are currently conducting investigations into cases covering a range of Fraud category types including:

- Social Care
- Right to Buy (RTB)
- Corporate and Internal
- Council Tax
- Social Housing Fraud
- "Career Polygamy"

Social Housing Fraud

4.2 In the second quarter of 2024/2025 two permanent Housing Tenancy Investigation Officers joined the team to work closely with our Housing Services Teams and to provide advice and guidance in the areas of fraud awareness prevention and the management of situations where fraud is suspected.

The remit of the CFT covers all aspects of social housing fraud, including:

- Sub-letting a property for profit.
- Providing false information in a housing application to gain a tenancy.
- Wrongful tenancy assignment and succession where the property is no longer occupied by the original tenant.
- Failing to use a social housing property as the principal home or abandoning the property (which could lead to squatting).
- Selling keys to a third party.
- Falsely claiming a RTB discount.

Referrals from potentially unlawful sub-let properties come from a range of different sources, including housing officers, contractors, the Council's fraud reporting hotline, the fraud referral form on the Council's website and data matching exercises, where housing data is matched electronically with data held by Slough Borough Council and other Councils and data sources. Some referrals come through pro-active exercises, in the form of residency checks undertaken by housing staff in conjunction with the CFT.

In addition to the unlawfully sublet properties, the work undertaken for housing includes reviewing potentially unlawful RTB applications, tenancy successions, false housing applications, and tenants that are alleged not to be using the property as their main residence.

Subletting is a criminal offence under the Prevention of Social Housing Fraud Act 2013 and each case is considered for criminal action. Please see [Appendix 3](#)

Right to Buy (RTB) Fraud Anti Money Laundering (AML) checks.

4.3 The CFT ensure that all RTB applications are subject to vigorous verification confirming residency and eligibility of funds used in the purchase to ensure they abide by money laundering regulations. As well as verifying the details provided to purchase the property in the application the CFT carry out un-notified visits to ensure residency.

Additional Monies Recovered

During a RTB investigation, evidence may be found that an applicant has fraudulently claimed Housing Benefit, Council Tax Benefit, Council Tax Support, Discretionary Housing Payments, Single Person Discounts, or a combination of two or more of these benefits.

Nationally, the number of RTB applications over the last few years has risen dramatically, and proportionate measures are needed to avoid selling council properties to those whose funds are derived from criminal activity.

On November 21st 2024 the RTB discounts were reduced leading to 300 applications, prior to these changes 10-15 applications per month was the average in Slough. It is expected that 50% will require AML checks and will filter through in Quarter 2 2025/2026.

The team have also been working with the RTB team to ensure that funding for property purchases is from legitimate sources. The AML checks protect the Council from receiving funds from unverified and illegitimate sources.

Council Tax Fraud

- 4.4 Slough Borough Council's Revenues and Benefits Team conduct a review of all properties in the Borough who are receiving a single person discount. They also provide data for the National Fraud Initiative. Any accounts they believe are fraudulent should be referred to CFT for further investigation and legal proceedings where appropriate. Referrals are also received through the online reporting form, and via the telephone fraud hotline which is manned during office hours.

In December 2024 a review of the Disabled Reduction Discount was undertaken by a member of the CFT. A review letter was designed and went live on the website on 8th January 2025. 268 letters were issued and posted out with the following results so far:

- 186 – Returned no issue
- 6 – No Overpayment (due to benefit / liability change)
- 9 – Re-assessed Overpayments £7698 fully recovered + 2 Admin fees of £100.00
- 4 – Awaiting re-assessment
- 60 – Left to respond: 2nd reminders issued 26th March 2025 contacted by telephone, email or home visit.
- 3 - Queries outstanding

Figures will be updated in Quarter 1 2025/26.

Social Care Investigations

- 4.5 The CFT work with social care staff and the Financial Assessment Benefits (FAB) team to investigate referrals where there are concerns over potential fraud. The National Fraud Initiative (NFI) are hoping to have an operational plan in place to ensure they can reintroduce adult social care data matching in the summer of 2025. This data, which would include residential care homes and personal budget data, has been excluded from the NFI work programme since 2021.

Corporate Fraud Investigations

- 4.6 Corporate investigations cover all areas of the Council's business and include all investigations originating from within the organisation or externally from individuals, contractors, or suppliers to the Council.

There has been an increase in referrals received that relate to employees and therefore all enquiries have taken into consideration issues covered under Council's Code of Conduct for employees, compliance with the Council's Constitution and the Council's Financial Procedure Rules, and other associated rules and regulations.

The CFT have three open cases which involve current or former members of staff and are still open investigations. One of those cases has been submitted to HB Public Law for consideration to prosecute. This is a joint investigation with two Local Authorities and 1 Housing Association.

In September 2024, the CFT commenced an investigation into a number of Direct Debits which had been set up against the Council's Direct Account. Vitality Life had made contact with the Team to communicate concerns in relation to two life insurance policies in respect of which an online Direct Debit had been set up, using SBC's Direct Account to pay the premiums. As a consequence of this a review of the Account was undertaken, aimed at identifying all Direct Debit instructions that had been set up on this account dating back as far as records would allow.

This revealed a sustained attack on the account by person or person's unknown, dating back as far as 2017. The investigation identified fraudulent direct debit instructions in respect of 28 beneficiaries for items such as; magazine subscriptions, gym memberships, life insurance, breakdown cover and utility bills. All the Direct Debit instructions that were still live were cancelled, and payments taken by the various beneficiaries were either refunded directly, or where refunds weren't forthcoming, claims raised under the Direct Debit Indemnity Scheme via Lloyds Bank for return of the funds. In total, £45,315.28 has now been recovered.

Proceeds of Crime Act

- 4.6 Stopping fraud and corruption from happening in the first place is always our aim. However, a robust enforcement is still needed to pursue fraudsters and recovering fraud losses provides the community with the assurances that fraud will not be tolerated by SBC. Furthermore the use of strong punishments such as prosecution and proceeds of crime contribute towards the Council's overall fraud resilience and act as a deterrent to potential fraudsters.

The CFT continues to work with partners to recover the proceeds of crime from those who gained from their unlawful activities and have been successfully prosecuted, to send out a clear message that crime does not pay. The Council has two accredited financial investigators (AFIs) that have recovered £28,809 since 1st April 2024 through the Home Office Asset Recovery Incentivisation Scheme (ARIS).

There are currently earmarked reserves of £326,059 that can be specifically utilised for reducing crime (reduction, detection and prevention) initiatives, to benefit the residents of Slough

The majority of the CFT POCA cases come from close working relationships with Trading Standards and Planning Enforcement. However, referrals of suitable cases to the AFIs have been fewer post pandemic and as a consequence, ARIS income has reduced from previous levels. This is largely due to limited resources within both the Trading Standards and Planning Enforcement Teams, both historically and currently.

In addition, the AFI's also provide their services to other Local Authorities who require assistance, on a case-by-case basis. This service is provided at an agreed hourly rate, with any ARIS payments resulting from the confiscation order obtained in these cases, going to the partner Authority.

Appendix 4.

Fraud Awareness

- 4.7 As part of the CFT commitment to strengthening the counter fraud culture within the Council The team will continue to carry out Fraud Awareness sessions to colleagues throughout the organisation where requested with the aim to raise awareness and discuss the different types of fraud that could occur within their service areas.

The CFT strives to assist employees to learn the importance and impact of fraud, the risks related to processes and policies which would eliminate the risk of fraud, how to recognise indicators of fraud etc.

The CFT has created bespoke training (counter fraud awareness) to highlight SBC's Fraud Policy and how the Counter Fraud Team works with different departments to eliminate and identify fraud and potential fraud risks. The training covers Local Authority fraud and the types of fraud that the CFT have investigated. In collaboration with the Learning and Development team a Fraud

Awareness module should be ready staff to complete on a regular basis and for all new members of staff.

The CFT do not have the resources to investigate all allegations of fraud therefore it is essential that we take measures to prevent it. One important method of deterrence is publicity. We publicise successful outcomes, including case studies in articles published to all staff, resident newsletters, and local press. This reminds the Staff and Public that action will be taken if they commit fraud against the Council.

Proactive Exercises

- 4.8 In addition to the reactive and proactive core work detailed above, the CFT have been working on proactive projects which are aimed at both the prevention and detection of fraud through data-matching, the introduction of new technology and the review of procedures, documentation and working practices.

New Homes Bonus

This is a yearly pro-active to maximise the grant received from Central Government by identifying empty properties that are now occupied. The net number of properties brought back into occupation attracts a grant from Central Government. The Empty Properties Review initiative is viewed as a significant success, the subsidy from this will improve the financial position of Slough Borough Council. The health-check review highlighted that SBC was in a positive position and therefore it was even more imperative to conduct the initiative as every adjusted account would count in monetary value.

The table below illustrates the number of property accounts updated against the overall total and the projected value to Slough Borough Council:

TYPE	Number	Found Occupied	%	New Homes Bonus (gross value £)
Long term empty properties	239	122	51%	£266,238.16

Gross projected financial return prior to costs **£266,238.16** (received).

The Government have indicated that this scheme will run for 1 more year.

Blue Badge Fraud

- 4.9 The CFT undertakes work to prevent, detect and investigate instances of Blue Badge fraud and misuse, taking appropriate sanction action where necessary.

- 5 Blue Badges have come into the council's possession.
- 3 Formal Cautions were issued.
- 2 Warning Letters issued.

We will be arranging Blue Badge pro-actives again with SBC's Parking Enforcement Team in Slough town centre and surrounding areas. We carry this pro-active out to deter the misuse of Blue Badges. This exercise is a visual presence that provides assurance to residents that SBC takes this fraud seriously and to deter misuse across the Borough. We aim to liaise with our Windsor and Maidenhead colleagues as a high proportion of the confiscated badges were issued to Slough Residents but misused in Windsor.

National Fraud Initiative

- 4.10 The Council participates in the mandatory bi-annual National Fraud Initiative (NFI) run by the Cabinet Office.

The matches for SBC became available in December 2024 the CFT key NFI contact will allocate reports to the key stakeholders who have agreed to check all matches marked as high priority if the report identifies a significant number of cases, a decision will be made on whether the entire report should be checked. The matches can provide a significant contribution to savings areas including Subsidised Travel Passes Blue Badges Housing and Revenues. Please refer to [Appendix 5](#)

Joint Working Cases

- 4.11 The CFT refer cases to both internal and external partners to investigate cases that fall under their jurisdiction. Over the last year this has included the Department for Work and Pensions, The Police, Housing Association, and other Local Authorities.

We are currently working with a number of Local Authorities in relation to “Career Polygamy” Fraud and Housing Fraud

The CFT are members of The London Borough Fraud Investigations Group (LBFIG) whose purpose is to disseminate best practice, discuss cross boundary fraud and provide valuable information and Intelligence within the fraud network.

Policies

- 4.12 Relevant policies are reviewed bi-annually and submitted for approval.

5.0 Implications of the Recommendation.

Financial Implications

- 5.1 All fraud has a detrimental financial impact on the Council. In cases where fraud is identified, recovery action is taken to minimise the impact that such instances cause. This also includes action, where appropriate, to make improvements to the financial administration arrangements and controls within the Council to reduce the risk of further threats.

Legal Implications

- 5.2 The Council has a duty under S151 of the Local Government Act to make arrangements for the proper administration of their financial affairs. To effectively discharge this duty, these arrangements include Council policies and procedures which protect the public purse through managing the risk of fraud and error.

All cases are conducted in line with legal requirements for criminal investigations and if appropriate are referred to the Police for investigation.

Risk Management Implications

- 5.3 The risk of fraud is being managed in a number of ways including:
- Through the Counter Fraud team work on fraud, which is monitored by the Audit and Corporate Governance Committee.
 - Through agreed management action taken in response to fraud investigations and/or proactive reviews.

Environmental Implications

- 5.4 There are no direct environmental implications in this report.

Equality Implications

- 5.5 Section 149 of the Equality Act 2010 imposes a legal duty on the Council to have due regard to three specified matters in the exercise of their functions:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The 'protected characteristics' covered by section 149 are race, gender, disability, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnership.

The Council acting in its role as Prosecutor must be fair, independent, and objective. The ethnic or national origin, gender, disability, age, religion or belief, political views, sexual orientation, or gender identity of the suspect, victim or any witness must not improperly influence the Council's decisions.

Appendix 1

Corporate Fraud Team Results Report**Quarter 1 April to June 2024:Quarter 2 July to September 2024****Quarter 3 October 2024 to December 2024: Quarter 4 January 2025 to March 2025**

Appendix 2

Area of Activity	Q1 Apr-Jun 24	Q2 July-Sept 24	Q3 Oct –Dec 24	Q4 Jan- Mar 24	Total
New Homes Bonus				£266,238 gross	£266,238 gross
Right to Buy Anti Money Laundering (AML) discount)	£192,000	£96,000	1 x £84,600	1 x £84,600	£457,200
Housing Benefit Overpayments Identified	£875		£11,477	£178	£12,530
Council Tax Support Overpayments Identified	£7,029	£4329		Nil	£11,358
Formal Caution payments		1 x £100		2 x £100	£300
ASC Direct Payments Overpayments Identified	£12,183	£28,102			£40,285
Single Person Discount recovered		£2193			£2,193
Disabled Reduction Discount Q4				£7698	£7698
Property Recovered back into stock (value)	1 property = £180,000	1 property = £175,000	1 property = £240.000	4 properties = £686,000	£1,281,000
Blue Badge Fraud	1	1	1	2	5
Financial Investigations Income	£10,615	£18,194			£28,809
Revenue (External)	£1,550	£8,479		£4,737	£14,766
Revenue (Internal)				£51,883	£51,883
Anti-Money Laundering checks cleared	1	5	9	23	38
AML Referrals	13	10	14	30	64
Fraud Referrals	32	41	38	33	148
Rejected Referrals	17	20	17	9	63
Enquiries Actioned	94	120	122	78	414
Cases Pending Allocation	2	NIL		3	5

Enquiries sheet stats 24/25 -

	Member of public	Police	DWP	H Association	SBC Depts	LAIEFS	Other	Total
Q1								
April	5	24		0	4	0	0	33
May	12	18	1	0	1	2	0	34
June	0	18	0	0	2	1	0	21
	17	60	1	0	7	3		88
Q2								
July	8	37	0	0	1	3	0	49
Aug	11	30	0	0	3	6	1	51
Sept	1	19	0	0	1	2	1	24
								124
Q3								
Oct	4	38	2	0	0	1	0	45
Nov	3	30	0	0	3	2	0	38
Dec	4	41	0	0	1	0	1	47
								130
Q4								
Jan	2	29	1	0	2	0	1	35
Feb	5	28	1	0	3	1	0	38
March	1	13	1	0	1	2	1	19
								92
TOTALS								434

AML Referrals set up 64

Fraud Investigations set up 148

Police GDPR requests 325

Appendix 3

Temporary Accommodation Work

After discovering there was a number of rent accounts on NEC with high arrears, corporate fraud undertook a project to visit 300 properties to ensure the tenant was still at the property, why they did not have housing benefit in place and encourage the tenant to set up the claim to clear the arrears.

The properties visited brought up a number of issues that included referral to housing regulations, lack of contracts in place, keys being given to tenants with no sign up or rent account created. There were also deceased tenants the council were unaware of, overcrowded tenants, tenants not residing in their rooms and others who were in HMP or had been moved to another location.

Tenancy audits were undertaken and the results passed back to the Temporary Accommodation task force. The results of this project were hard to track due to a number of inconsistencies on NEC, changes in the management task force and lack of reply despite asking for the figures.

We are aware of £12,000 return in a property, a move for an overcrowded family and a number of allocations cancelled due to tenants no longer being there, deceased or moved. The project highlighted some key flaws in the system in terms of ensuring sign-ups are done, regular visits to TA, ensuring rent accounts are set up and keys are not handed to tenants with no agreements in place.

Financial Investigation Asset Recovery Incentivisation Scheme (ARIS)
Income Report 2024-25

Financial Investigation ARIS Income			
Date Received and related Quarter/Year	Source of Prosecution	£ ARIS Amounts (pre and post top slice)	Current Ring-fenced Funds (Actual) £
2023/2024			307,446.58
4/7/2024 (Q4 – 2023/24)	Trading Standards	£750 (710.92 after 5.211% top slice)	308,157.50
4/7/2024 (Q4 – 2023/24)	Trading Standards	£1,875 (1777.29 after 5.211% top slice)	309,934.79
4/7/2024 (Q4 – 2023/24)	Trading Standards	£1,875 (1777.29 after 5.211% top slice)	311,712.08
4/7/2024 (Q4 – 2023/24)	Trading Standards	£666.75 (632.01 after 5.211% top slice)	312,344.09
4/7/2024 (Q4 – 2023/24)	Trading Standards	£5,422.55 (5139.98 after 5.211% top slice)	317,484.07
7/1/2025 (Q2 – 2024/25)	Planning	£9750 (9,116.25 after 6.5% top slice)	326,600.32
7/1/2025 (Q2 – 2024/25)	Planning	£9,709.24 (9,078.15 after 6.5% top slice)	335,678.47
Agreed – Sept 2024	Training Costs (2 x Housing Investigators & 1 x Intelligence Officer)	Less £9,619.00 drawdown	326,059.47

During the financial year 2024/25, a further £28,231.89 in income was realised from the Asset Recovery Incentivisation Scheme (ARIS). This was the result of two successful prosecutions, one instigated by Trading Standard's and the other Planning Enforcement, whereby confiscation orders were obtained using the Proceeds of Crime Act 2002 (POCA).

Two additional posts for Housing Investigators were created within the Corporate Fraud Team during 2024/25 in order to tackle Housing Fraud, an area of increasing concern within the Borough. It was agreed to use the ARIS income to fund appropriate training for both the new officers and also additional training for the team's Intelligence Officer. An amount of £9,619 will be subsequently drawn down at year end 2024/25 to fund this.

There are now total funds of £326,059.47 available to spend on crime prevention/reduction/detection activities. Any proposed projects must be likely to result in the identification of cases suitable for prosecution, to ensure the ongoing existence of the council's Financial Investigation capacity and thus continued income generation.

NB: In 2014/15, the Government introduced a top-slice of funding which was reserved for projects that contributed towards improving the national asset recovery performance picture. The top slice would be applied before any amounts are allocated to the Home Office or operational partners like SBC. The amount is pre-determined by the Government.

Appendix 5

Initial NFI Report – 2024-2025

CONCESSIONARY PASSES – 849 matches for 2024/2025

We have raised concerns in this area of data matching previously and have recommended some points that would reduce the number and promote savings.

We have found several matches where the holder has passed away many years ago the passes are automatically renewed and sent out to the addresses held on the system. At many of the addresses there are new occupants?

Mrs W passed away in 2016, pass has been automatically renewed the latest one expires in 2028.

Mr S passed away in 2012 “Tell Us Once” received Concessionary pass was not cancelled and has been renewed automatically ever since latest expiry date 31.3.2028.

All of the above have now been cancelled.

Recommendations: Remove automatic renewal, apply a nominal fee, subscribe to the NFI mortality data issued twice a year to remove bus passes

Another area of concern is that several passes have been issued to persons that do not live in the SBC area. They live on the boundaries of Slough but pay Council Tax to other Councils.

Examples: Mr D in an SL3 postcode but is covered by Bucks Council, his wife has also been issued with a Slough Concessionary pass.

A quick check on FIND YOUR LOCAL COUNCIL would have prevented this badge being issued incorrectly.

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CORPORATE FRAUD TEAM GLOSSARY

CFT	Corporate Fraud Team	
DWP	Department for Work & Pensions	
LAEIFS	Local Authority Information Exchange Forms	
AML	Anti-Money Laundering	
GDPR	General Data Protection Regulation	
ARIS	Investigation Asset Recovery Incentivisation	
PACE	Police and Criminal Evidence Act 1984	
POCA	Proceeds of Crime Act 2002	
RTB	Right to Buy	
CTRS	Council Tax Reduction Scheme	
SPD	Single Person Discount	
ASC	Adult Social Care	
NFI	National Fraud Initiative	
LBFIG	London Boroughs Fraud Investigators Group	
HB	Housing Benefit	
ALTIA	Fraud Team Case Management Software System	
ESA	Employment Support Allowance	