



East Herts Council

Progress Report
Anti-Fraud Plan 2018/19

January 2019

Members are recommended to:

Note the work of the Council and the Shared Anti-Fraud Service in delivering the *Anti-Fraud Plan 2018/19*.

Contents

1. Introduction
2. Fraud Awareness and Fraud Reporting
3. Counter Fraud Staffing
4. Counter Fraud Activity
5. SAFS KPI Performance

Appendix

- A. EHC/SAFS Anti-Fraud Plan 2018/19

1. Introduction

In March 2018 this Committee approved the Anti-Fraud Plan proposed by senior officers and SAFS management- see **Appendix A**. The Plan followed guidance and best practice from the Chartered Institute of Public Finance and Accounts (CIPFA), The Local Government Association (LGA) and the Ministry for Housing, Communities and Local Government (MHCLG).

In particular the Plan for 2018/19 took account of the following reports.

- *Fighting Fraud and Corruption Locally 2016–2019 Strategy*
- *UK Annual Fraud Indicator 2017*
- *Fraud and Corruption Tracker 2017*
- *United Kingdom Anti-Corruption Strategy 2017-2022*

The main aim of the Plan is to deliver an anti-fraud culture across the Council, with the prevention and deterrence of fraud being the primary objective but, ensuring that sufficient resources are in place to investigate fraud, where its occurs, and pursue those guilty of defrauding the Council, including the recovery of losses and imposition of penalties, both civil and criminal.

The following page shows the planned anti-fraud activity for the Council in 2018/19 and the current status for each area.

Progress- EHC / SAFS Action Plan 2018/2019					
CIPFA Principles	SAFS Objectives	Goals & 6Cs	Activities	Responsible Officer	Progres
ACKNOWLEDGE	Ensure ongoing effectiveness and resilience of anti-fraud arrangements	Fraud is acknowledged as a Risk for the Council CULTURE	The Council has in place Anti-Fraud and Corruption Strategy	Head of Finance / Head of Legal	Complete
			The Council has a Fraud Response Plan and this Action Plan	Head of Finance / Head of Legal	Complete
			PAG and Senior Managers ensure compliance with CIPFA best practice in their counter fraud arrangements	Head of Finance	Ongoing
			The Council conducts Fraud Risk Assessments	SAFS Mgr/ Risk Mgr	Complete
			The Council has in place Policies to deal with Money Laundering/ Bribery/ Whistleblowing/ Cyber-Crime	Head of Legal	Reviews ongoing
	Improve the reach into areas of 'corporate' fraud across all Partners	The Council has a robust communication policy demonstrating its commitment to prevent fraud COMMUNICATION	The Councils Communication Team will publicise prosecutions and anti-fraud campaigns conducted by it and SAFS	Head of Comms	Ongoing
			SAFS will provide access to fraud reporting tools (web/phone/email)	SAFS Mgr	Complete
			The Council and SAFS will make available fraud awareness or specific anti-fraud training across all Council services	SAFS Mgr & Head of HR	Complete
			Provide fraud alerts to appropriate officers/staff/services.	SAFS Mgr	Ongoing
			SAFS will provide an E-Learning Packages for staff/members	SAFS Mgr & Head of HR	Ongoing
PREVENT	Create a data hub for Hertfordshire	Co-ordination of effort, sharing of best practice, data, fraud alerts and new threats. COLLABORATION	Develop existing SAFS Data Hub to improve the use of Data to prevent/identify fraud	SAFS Mgr	Ongoing
			Review data sharing agreements/protocol between internal and external partners	Head of Legal / SAFS Mgr	Ongoing
			Work to develop 'Flexible NFI' & 18/19 NFI Matches	SAFS Mgr	Complete
			Work with DWP to deliver CTRS/HB/Housing Fraud 2018 National roll-out	SAFS Mgr/ Head of Finance	Complete
			Work with other organisations, including private sector, to improve data-sharing	SAFS Mgr	Ongoing
	Develop services which can be marketed to external bodies	Have the highest levels of professional standards COMPETENCE	All SAFS staff will be fully trained and accredited	SAFS Mgr	Complete
			All investigations will be undertaken in compliance with relevant legislation and Council Policies	SAFS Mgr	Complete
			SAFS will work with bodies such as CLG/LGC/CIPFA to develop local anti-fraud strategies at a national level	SAFS Mgr	Ongoing
			SAFS will work with Council Services to make best use of 3rd party Providers such as NAFN, PNLD etc	SAFS Mgr	Complete
			Deliver financial benefits in terms of cost savings or increased revenue	Ensuring the Counter-Fraud Measurs are appropriate to the range of fraud risk. CAPABILITY	SAFS will provide reports to Board and SAFS Champions quarterly on anti-fraud activity at the Council
SAFS will record and report on all fraud referred, investigated and identified	SAFS Mgr	Ongoing			
SAFS will review fraud trends and new threats and report on these to Council Managers	SAFS Mgr	Ongoing			
SAFS and the Council Legal and Debt teams will seek to 'prosecute' offenders and recover losses	SAFS Mgr /Head of Legal/ Head of Finance	Ongoing			
Create a recognised centre of excellence that is able to disseminate alerts and share best practice nationally	Develop the right level of resources to deal with the level of fraud risk CAPACITY	The Council will review its ROI from SAFS Membership			Head of Finance
		SAFS will assist the Council in providing its Transparency Code (Fraud) Data annually	SAFS Mgr	Complete	
		Reports to Senior Mgt and Audit Committee on SAFS and Council activity	SAFS Mgr / Head of Finance	Complete	
		Inclusion of Fraud Risks and the Councils actions to manage/mitigate/reduce this in its Annual Governance Statement	Head of Finance	Under Review	

2. Fraud Awareness and Fraud Reporting

One of the key aims for the Council is to create an ‘Anti-Fraud’ culture. This will assist preventing and deterring fraud; encourage senior managers and members to consider the risk of fraud when developing policies or processes; encourage all staff and local residents to understand the impact of fraud on Council services and to report fraud where it is suspected.

The Council ensures that suspected fraud can be reported by both staff and the public alike. The Council's website has details on how to report fraud and links to the SAFS webpage. The SAFS webpage – www.hertsdirect.org/reportfraud includes an online reporting tool. A confidential fraud hotline (0300 123 4033) and a secure email account are also available for reporting fraud – fraud.team@hertfordshire.gov.uk. None of these functions replace the Council's own in-house Whistleblowing procedures.

The SAFS have issued several alerts to officers from the National Fraud Intelligence Bureau and the National Anti-Fraud Network reporting new and emerging fraud threats or fraud trends. SAFS have also issued reminders to staff to be vigilant against the continued attempts by fraudsters, using social media and fake emails, to encourage breaches of financial regulations and payment processes.

3. Counter Fraud Staffing

In April 2018 the SAFS Team was composed of sixteen accredited counter fraud staff and is based at Hertfordshire County Council's offices in Stevenage.

Each SAFS Partner receives dedicated support and response from the SAFS team. The most effective way to do this is by allocating officers to work exclusively for each Partner. These officers act as the first point of contact for that Partner's services, and will assist in developing relationships at a service level, delivering training, and working on local pilot projects. SAFS Officers have access to Council offices, officers and systems to conduct their enquiries.

For the *2018/19 Anti-Fraud Plan* SAFS deployed one Counter Fraud Officer to work exclusively for the Council. This officer was supported by SAFS Management and Intelligence Team which includes data-analytics & financial investigation specialists.

4. Counter Fraud Activity

To the end of December 2018 SAFS had received 62 allegations of fraud affecting Council services. 28 cases were carried forward from 2017/18, and 48 cases were still under investigation in January 2019.

Reported fraud covers a number of Council services and these reports come from a variety of sources including Council staff. Compared to other district councils in the SAFS Partnership the volume and variety of alleged fraud being reported is very good.

Table 1. Types of fraud being reported (in year):

Housing Benefit & Council Tax Support	Housing & Homeless	Blue Badge	Other Council Tax Discounts	Total
37	6	5	14	62

Table 2. Who is reporting Fraud?

Fraud Reported by Staff	Reports from Public	Proactive Drives and Data-Matching	Other	Total
26	31	2	3	62

At this time many cases raised for investigation are still in the early stages. However, of the 14 cases investigated and closed in year where fraud was identified have yielded combined losses and savings of £83k. A full breakdown of all cases where fraud has been identified and how savings/losses are recorded will be included in the *2018/2019 Annual Report* to this Committee in 2019.

Two prosecutions for housing benefit and/or council tax support fraud have been concluded successfully, one led by DWP/CPS Prosecutors one by the Councils own legal team, and two further matters are awaiting prosecution.

SAFS has worked with the Revenue & Benefit Service to identify potentially fraudulent applications for discounts and exemptions. The Council is now making active use of civil and financial penalties relating to false claims for discounts and exemptions as an alternative to prosecution, where appropriate. So far the Council has imposed financial penalties on four occasions in 2018/19.

The national roll-out of joint working with the DWP Fraud and Error Service in February 2019 follows a successful 18 month pilot at three SAFS sites in Hertfordshire, including East Herts Council. This activity assists the Council in the early identification and prevention of Housing Benefit fraud.

SAFS continues to work with social housing providers investigating allegations of housing fraud within the Councils boundaries. This work is of particular benefit to the Council as it has nomination rights for residents on the Housing Register to any properties that are recovered as a result of this work.

SAFS completed the delivery of a framework contract for all councils in Hertfordshire to make use of to conduct bulk reviews of council tax discounts and exemptions to improve collection rates and prevent fraud. The Council have made use of this framework and a review of this work is due for completion in the next few weeks.

Council officers have ensured the Council complies with the National Fraud Initiative (NFI) which takes place between October 2018 and February 2019. The NFI is a national anti-fraud data sharing exercise conducted by the Cabinet office every two years across local and central government. Results from this work will be reported from March 2019 onwards to the Cabinet Office and senior management at the Council.

Working with HR Learning and Development team at the County Council SAFS have designed and delivered an E-Learning package for all staff hosted on the Councils intranet. SAFS have also been delivering training to front line staff to assist in the identification of false identity documents.

In October and November 2018 the Council supported the *International Anti-Fraud Week* with a publicity campaign including the use of social media and press releases timed to coincide with work that the SAFS team were undertaking for all Partner organisations.

In October 2018 the SAFS Partnership was awarded a Highly Commended status at the *Institute of Revenues Rating and Valuations* annual conference for its work in combatting fraud against local government.

5. SAFS KPI Performance

KPI	Measure	2018/2019 Target	Achieved in Qtrs 1-3
1	Provide an Investigation Service	<ul style="list-style-type: none"> • 1 FTE on call at EHC (Supported by SAFS Intel/ Management). • Membership of the National Anti-Fraud Framework (NAFN) • Access to NAFN for relevant EHC Staff • Membership of CIPFA Counter Fraud Centre • Fraud training events for staff/Members 	<ul style="list-style-type: none"> • 1 FTE in place with full support. • Membership of NAFN in place and training provided to officers. • SAFS are members of the CIPFA Counter Fraud Centre for all Partners. • Staff training sessions delivered and more planned in early 2019
2	Identified Value of Fraud prevented/detected. Based on the Methodology agreed by SAFS Board	£150k From fraud identified and savings/prevention	£83k (£35K Fraud Losses & £48k Fraud Savings reported)
3	Allegations of fraud Received. From all sources.	100 Fraud referrals from all sources to SAFS	62 Referrals received
4	Success rates for cases investigated. This will ensure that quality investigations are undertaken.	50%	50% (14 cases closed- 7 proved)
5	Conduct Data-Matching using the local data-hub, NFI and other data-matching/mining.	<ul style="list-style-type: none"> • Data-Hub for local data matching. • Access to NFI output. • County wide Council Tax Review Framework. 	<ul style="list-style-type: none"> • EHC submits data to the SAFS Data-Hub. • NFI 2018/19. • CTax Framework available for Discount Reviews

Appendices:

A. EHC Anti-Fraud Plan 2018/2019



2018/2019
Anti-Fraud Plan