



East Herts Council

Audit and Governance Committee

September 2023

Anti-Fraud Progress Report 2023/2024

Purpose

1. This early report provides details of the work undertaken by the Shared Anti-Fraud Service (SAFS) and Council Officers to protect the Council against the threat of fraud and the delivery of the Council's Anti-Fraud Action Plan for 2023/24 in Qtr 1.
2. Further reports will be provided to this Committee in 2023/24 with detailed progress with delivery of the agreed Plan and SAFS KPI performance.

Recommendations

3. Members are RECOMMENDED to:

- a) **Note the progress by officers and the Shared Anti-Fraud Service to deliver the 2023/2024 Anti-Fraud Plan for the Council.**

Delivery of the Anti-Fraud Plan

2023/24 Plan

4. The 2023/2024 Anti-Fraud Plan was approved by this Committee at its March 2023 meeting. This Plan covers all areas recommended by CIPFA and the *Fighting Fraud and Locally Strategy for the 2020s*. The Plan also provides assurance that the council continues to benefit from a positive return on its investment in the SAFS Partnership. See **Appendix 1** for details of the Plan.

2023/2024 Anti-Fraud Activity

5. The Council has in place an Anti-Fraud, Bribery & Corruption policy and an Anti-Money Laundering Policy. A review of all policies will take place in 2023/24 to ensure compliance with current best practice and any changes required by legislation, which may include the 'Economic Crime and Corporate Transparency Bill' and the 'Police, Crime, Sentencing and Courts Act 2022'.
6. A training plan to build on staff awareness and fraud reporting, along with a publicity campaign to inform the public and encourage fraud reporting, is being developed with officers in HR and Comms teams. SAFS have met with HR leads at the Council to arrange this and consider options to review the current E-learning system in place for officers.
7. SAFS have already issued a number of alerts to officers this year including matters on mandate/payment frauds, payroll frauds and others. These are shared with SAFS Board members to cascade but also with the service areas most likely to be affected. The **Head of Strategic Finance and Property** is the SAFS Board representative for East Herts Council.
8. Between April and June 2023 a further 18 allegations of fraud were received by the Council/SAFS, there have been some delays with cases being reported to SAFS by officers and we are working to alleviate this issue. 23 cases are live and under investigation with an estimated combined fraud loss of £278k.

9. SAFS officers along with colleagues across the Council continue to resolve the output from the NFI 22/23 exercise. To date of 184 matches, around 25% have been cleared. In addition the Council is taking part in the Herts FraudHub with data now being submitted to the FraudHub, along with the other 7 partners in the SAFS Partnership and we have started reviewing the output from this work in Qtr 2.
10. We are taking part in a pilot project with the Cabinet Office and the London Boroughs Fraud Investigators Group (LBFIG) to utilise the FraudHub structure to identify 'polygamous workers'- essentially employees or agency workers who work for multiple employers at the same time. If these incidents or multiple placements are not disclosed/managed they can create a variety of fraud risks.
11. SAFS manages the 'Council Tax Review' framework for all borough/district councils enabling them to identify fraudulent applications for council tax discounts. The new contract has been delivered by SAFS working with all district/boroughs and is now live and North Herts Council is signed up to take part in 2023/24 with both Empty Homes and Single Person Discount Reviews.
12. SAFS KPIs were agreed with senior officers for 2023/24 and progress against these is shown below. Under KPI-2A we are aware that the time recording from our new case management system (CMS) has not been working fully and SAFS staff have not been recording all time spent on work for the Council. We have addressed this and we will see an improvement from QTR 2 onwards. Under KPI-3 we identified an issue with our CMS which created some delays with referrals being cleared quickly, we are working with the provider to resolve this.

KPI	Objectives	Progress
1	<p>Demonstrate that the Council is receiving a financial return on investment from membership of SAFS and that this equates to its financial contribution.</p> <p>A. Meetings to take place with the Councils Head of Strategic Finance and Property</p> <p>B. Head of Strategic Finance and Property will sit on the SAFS Board.</p> <p>C. Regular meetings to take place with Service Leads to agree and update local work plans.</p> <p>D. Reports on progress with any area of work covered by the SAFS Partnership Agreement.</p>	<p>A. SAFS Mgt have meetings planned throughout the year with Senior Mgrs.</p> <p>B. SL invited to attend all SAFS Board meetings in 23/24</p> <p>C. Meetings with R&B Mgt in place on regular basis. Meetings between NJ and SL in place as well as with HR and Comms teams.</p> <p>D. This report, and others are available upon request. Reports to A&G to be published. SL will receive reports to SAFS Board.</p>
2	<p>A. 285 Days of counter fraud activity including proactive and reactive investigation work, data-analytics, training and fraud risk management (Supported by SAFS Intel/Management).</p> <p>B. Three Reports to Audit Committee.</p> <p>C. SAFS attendance at corporate governance, 'service champion' meetings, local management team meetings.</p>	<p>A. 36 days in Qtr 1. – 13%. Issues in Qtr with new CMS and staff understanding of what time can be recorded.</p> <p>B. A&GC Dates are booked in for Sep /Nov/Jan.</p> <p>C. SAFS Mgt still trying to identify relevant enforcement groups at EHC but have been working with Senior Mgrs across the Council.</p>
3	<p>A. All urgent/ high risk cases will be responded to within 24 hours.</p> <p>B. All other cases 2 Days, on Average.</p>	<p>A. CMS unable to record at present.</p> <p>B. Currently 8 days on average.</p>

4	<p>A. Membership of NAFN & PNLD</p> <p>B. Membership of CIPFA Counter Fraud Centre and access to CIFAS/NCSC/AF/FFCL alerts, trends, best practice</p> <p>C. NAFN Access/Training for relevant Council Staff</p> <p>D. 5 Training events for staff/Members in year. (To be agreed with Service leads and HR)</p>	<p>A. SAFS has membership of PNLD which has been offered to EHC Legal. NAFN membership via SAFS 23/24.</p> <p>B. SAFS/HCC member of CIPFA and CIFAS.</p> <p>C. NAFN service awareness is being shared across Council service areas.</p> <p>D. SAFS liaising with HR to arrange training programme for 23/24.</p>
5	<p>A. All reported fraud (referrals) will be logged and reported to officers by type & source.</p> <p>B. All cases investigated will be recorded and the financial value, including loss/recovery/ savings of each will be reported to officers.</p> <p>C. SAFS will work with social housing providers across the Borough to prevent tenancy fraud.</p>	<p>A. Fraud reporting options available for staff and residents on the NHC webpage and intranet- This is linked to SAFS reporting tools. Further Comms on this to be developed internally and externally.</p> <p>B. All cases are recorded on SAFS CMS</p> <p>C. Contracts in place with Clarion/Peabody/B3Living/Settle.</p>
6	<p>A. Support the output from NFI 2022/23 Council services.</p> <p>B. Membership and VFM from the Herts FraudHub in 2023/24.</p>	<p>A. Access to NFI data and relevant systems arranged for SAFS officers. Output and matches reviewed will be reported to the senior officers. Progressing well.</p> <p>B. Contracts with C/O signed. Data-upload schedules are now agreed and data is being shared. Output to be managed and reported</p>

Appendices

13. The following appendices are attached to this report:

Appendix 1 - SAFS/East Herts Council Anti-Fraud Plan 2023/24

Further Reading

14. List of Background Papers - Local Government Act 1972, Section 100D

- (a) **Councillors Workbook on Bribery & Fraud Prevention (LGA 2017)**
- (b) **Fighting Fraud and Corruption Locally- A Strategy for the 2020's (CIPFA/CIFAS/LGA 2020)**
- (c) **Tackling Fraud in the Public Sector (CIPFA 2020)**
- (d) **Guide to Understanding the Total Impact of Fraud (International Public Sector Fraud Forum 2020)**
- (e) **Code of Practice – Managing the Risk of Fraud and Corruption (CIPFA 2014)**
- (f) **Government Counter Fraud Standards (Cabinet Office 2021)**