

Audit Committee 26 June 2014

Report from the Chief Finance Officer

For Information

Wards Affected: ALL

Final Internal Audit Progress Report 2013/14

1. Summary

1.1. This report summarises the work of Internal Audit and the Investigation Team and provides an update on progress since the previous report to this Committee on 19 March 2014.

2. Recommendation

2.1. That the Audit Committee notes the progress made in achieving the 2013/14 Internal Audit Plan and the review of fraud work.

3. Detail

Audit

- 3.1. The Internal Audit Plan for 2013/14¹ comprises 1,248 days, including 48 days brought forward from the previous year which were not delivered (payments to the contractor were adjusted accordingly). The majority, 953 days, of the plan is delivered through Mazars (previously Deloitte) Public Sector Internal Audit Limited called off from a framework contract procured by Croydon Council. A small in-house team deliver a further 295 days.
- 3.2. The summary of final reports issued to date is as follows:

	Full	Substantial	Limited	None	Non- Assurance	Total
Final Reports	1	31	19	0	8	59
Draft Reports	0	9	12	0	1	22
Totals	1	40	31	-	9	81
Outstanding Reports yet to be issued						
Report Totals						
Planned Reports						83

- 3.3. The key points to note with regard to progress for the year are:
 - 81 draft and final reports issued (both Mazars and in-house output) against a planned total of 83 individual projects, representing 98% of the planned output.
 - 59 final reports issued, representing 71% of total projects.
 - Of the final reports (Council & BHP reports) issued to date and for which assurance opinions were relevant to date there have been 1 full; 31 substantial and 19 limited assurance opinions.
- 3.4. A summary report setting out the completed audit work is attached as Appendix 1. The status of all projects planned is set out in the table 1 below. The presentation of this table has been amended from previous versions and withdrawn audits are now shown in a separate Appendix 2.

Audit	Original Plan	Revised Plan	Total days delivered	Progress	Assurance Opinion/ Direction of Travel	Issue Date
CROSS COUNCIL / CORPORATE AUDIT						
Business Continuity Planning & Emergency Planning	10	10	10	Final Report	Limited (Improved)	12/09/2013
Corporate Income Collection Arrangement (Original focus was cemeteries and mortuary income)	10	10	10	Draft Report	Limited	29/05/2014
CROSS COUNCIL / CORPORATE Total	20	20	20			
FINANCE						
Pension Fund Investments	10	10	10	Final Report	Substantial (Unchanged)	13/11/2013
One Oracle Project (SME and FIT Meeting attendance)	11	14	14	Complete for 2013/14		
Insurance	15	15	15	Final Report	Limited (Deteriorated)	13/11/2013
Pre-Migration Audit - (AP/AR/GL)	0	17	17	Draft Report	Substantial (Unchanged	28/05/14
Finance Total	36	56	56			
HR						
Pre-Migration Audit (Payroll)	0	8	8	Draft Report	Substantial (Unchanged)	28/05/14
Disclosure & Barring (formerly CRB checks)	20	25	25	Revised Draft Report	Substantial	22/05/2014
Sickness & Absence Management	20	20	20	Draft Report	Limited	16/04/2014
HR Total	40	53	53			

CHILDREN AND YOUNG PEOPLE						
Christchurch	10	10	10	Draft Report	Limited	28/05/14
Mount Stewart Junior	10	10	10	Final Report	Substantial	13/12/2013
Our Lady of Grace Infants	10	11	11	Final Report	Substantial	13/01/2014
Our Lady of Grace Juniors	10	10	10	Final Report	Substantial	19/11/2013
Woodfield	10	18	18	Final Report	Limited	29/11/2013
Byron Court	10	13	13	Final Report	Limited	04/03/2014
Manor Day	10	10	10	Final Report	Substantial	04/03/2014
Braintcroft	10	10	10	Final Report	Substantial	15/01/2014
Harlesden	10	10	10	Final Report	Substantial	13/06/14
Kingsbury Green	0	10	10	Final Report	Substantial (Improved)	04/02/2014
Our Lady of Lourdes	10	10	10	Final Report	Substantial (Improved)	02/10/2013
Donnington	10	10	10	Final Report	Substantial	23/07/2013
Fryent	10	15	15	Final Report	Substantial	03/04/2014
Northview	0	10	10	Final report	Substantial (Unchanged)	26/02/2014
Mount Stewart Infants	0	10	10	Final Report	Limited	30/01/2014
Other School Issues / Training	0	11	11	Complete	Not applicable	
Follow up work for the schools with Limited Assurance	20	30	30	Follow-up audits. See Appendix 1 page 15 for details		
Capital Grant Funding for Nursery Places for 2 Year Olds	5	5	5	Complete	Non Assurance Work	31/05/2013
Gordon Brown Education Centre	10	12	12	Final Report	Substantial	28/03/2014
Troubled Families Grant Claim Certification Families Worked with June 2013	0	5	5	Claim certified	Grant Certification	15/07/2013
Troubled Families Grant Claim Certification Families Worked with August 2013	0	5	5	Claim certified	Grant Certification	23/08/2013
Troubled Families Grant Claim Certification Payment By Results August 2013	0	5	5	Claim certified	Grant Certification	23/08/2013
Troubled Families Grant Claim Certification Payment By Results October 2013	0	6	6	Claim certified	Grant Certification	25/10/2013
Troubled Families Grant Claim Certification Payment By Results January	0	12	12	Claim certified	Grant Certification	14/02/2014

2014						
Frameworki purchasing	0	12	12	Final Report	Limited	09/08/2013
Frameworki payments	0	11	11	Final Report	Non Assurance Work	10/12/2013
Placements	0	28	28	Draft Report	Limited	02/05/2014
Nurseries	0	25	25	Draft Report	Limited	12/05/2014
Frameworki Board Advisory	0	3	3	Completed.		
C&F Total	155	337	337			
ADULT SOCIAL SERVICES						
Transitions Team (14- 25 year old)	15	15	15	Draft Report	Limited	30/05/2014
Carers Audit	10	10	10	Final Report	Limited	04/12/2014
Kingsbury Resource Centre	0	10	10	Draft Report	Limited	26/02/2014
John Billam Resource Centre	0	10	10	Draft Report	Limited	28/05/2014
New Millennium Day Care Centre	0	10	10	Draft Report	Limited	28/05/2014
Tudor Gardens	0	15	15	Final Report	Substantial	29/05/2014
Appointeeship & Deputyship 2012/13 accounts verification	0	20	20	Final Report	Non assurance	13/06/2014
Soft Box - Migration of Data on Abacus to Frameworki	10	12	12	Final Report	Limited	10/12/2013
Adult Social Services Total	35	102	102			
ENVIRONMENT & NEIGHBOURHOOD (E&N)						
Recycling & Waste	10	10	10	Final Report	Limited	26/06/2013
Preparation work for Street Lighting Energy Consumption	0	3	3		See Appendix 2	
E&N Total	10	13	13			
LEGAL AND PROCUREMENT						
Members expenses and allowances	8	8	8	Final Report	Substantial (Deteriorated)	06/08/2013
G & CS Total	8	8	8			
REGENERATION & GROWTH (R&G)						
Capital Projects (Bronte House Disposal)	20	20	20	Draft Report	Limited	30/05/2014

Capital Projects (Byron Court)	10	10	5	Draft Report to	be issued	
Homelessness and Temporary Accommodation/ Housing Allocations	20	20	20	Draft Report	Limited (Deteriorated)	30/05/2014
S106	10	10	10	Final Report	Limited	28/05/2014
Community Infrastructure Levy	0	10	10	Final Report	Limited	28/05/2014
Council Tax	15	15	15	Final Report	Substantial (Unchanged)	23/03/2014
Local Council Support Scheme (formerly Council Tax Benefit)	12	12	12	Final Report	Substantial	13/06/2014
National Non Domestic Rates (NNDR)	15	15	15	Final Report	Substantial (Unchanged)	25/02/2014
NNDR Strategy	5	5	5	Draft Report	Non Assurance	30/05/2014
Housing Benefits / Discretionary Payments	20	25	25	Final Report	Substantial (Unchanged)	15/05/2014
R&G Total	127	142	137			
ASSISTANT CHIEF EXECUTIVE'S PORTFOLIO						
Data Quality	10	10	10	Final Report	Substantial	06/06/2014
Complaints	10	16	16	Final Report	Limited	06/06/2014
Grants to Voluntary Organisations	0	15	15	Draft Report	Substantial	30/05/2014
Grants to Voluntary Organisations (Public Health)	0	10	3	WIP		
Public Health Contract Management (Stop Smoking)	25	30	30	Final Report	Substantial	29/05/2014
Freedom of Information	10	20	20	Final Report	Limited	11/06/2014
Public Health Board	0	5	5	Complete		
ACEP Total	55	106	99			
IT Audits (132 Days)						
Oracle - Pre Implementation	10	16	16	Draft Report	Substantial	27/02/2014
Migration of Appointeeship and Deputyship (Abacus, ResFunds, Quicken)	10	14	14	Final Report	Limited	18/12/2013
View 360	10	10	10	Final Report	Substantial (Unchanged)	11/12/2013
Infostore - Apps Sharepoint Implementation	10	10	10	Final Report	Limited	29/04/2014

Academy	10	10	10	Final Report	Substantial (Unchanged)	05/11/2013
Telecommunications (telephony with iphones and also to include Ipads Security and management)	15	20	20	Final Report	Substantial	12/06/2014
Network Infrastructure	20	15	15	Final Report	Substantial	15/05/2014
Remote Access	12	10	10	Final Report	Substantial	12/06/2014
Follow Up	8	8	8	Complete		
Planning for 13/14 audit	1	1	1	Complete		
IT Total	106	114	114	*		
OTHER						
Risk Management	15	15	15	Complete		
Governance & Audit Planning 2014/15	13	14	14	Complete		
Consultation, Communication and Reporting (Mazars)	55	55	55	Complete		
Follow-Up	45	45	45	Complete		
Office Move & Archiving	10	15	15	Complete		
Advice on Internal Controls	0	3	3	Complete		1
Contingency	19	0	0			
OTHER Total	157	147	147			
BRENT HOUSING PARTNERSHIP (BHP)						
Housing Repairs and Maintenance	12	12	12	Draft Report	Limited (Improved)	20/05/2014
Housing Rents	8	8	8	Final Report	Substantial (Unchanged)	10/12/2013
Major Works Contracts (1)	5	5	5	Final Report	Limited	12/06/2014
Major Works Contracts (2)	5	5	5	Final Report	Substantial	12/06/2014
Key Financial Systems Transactions Testing - AR/AP/GL	0	8	8	Draft Report	Substantial	29/05/2014
Key Financial Systems Transactions Testing - Payroll	0	4	4	Draft Report	Substantial	28/05/2014
Rent Arrears Management	12	12	12	Final Report	Substantial	16/04/2014
Budget Management	0	8	8	Final Report	Substantial	31/03/2014
Voids and Disrepair	10	12	12	Final Report	Limited	01/04/2014
Fire Safety	12	12	12	Final Report	Limited	18/12/2013
Gas Safety			ļ	Final Report	Full	18/12/2014
					(Unchanged)	

Management of Non Brent Properties	12	12	12	Draft Report	Substantial (Improved)	20/05/14
Resident Involvement	12	12	12	Final Report	Limited (Improved)	07/05/2014
Leasehold Management and Service Charges	12	12	12	Final Report	Substantial (Unchanged)	19/05/14
One Oracle Pre- Migration	0	10	10	Draft Report	Substantial	27/02/2014
Management and Follow up	20	18	18	Complete		
BHP Total	120	150	150			
Total	869*	1248	1236			

Table 1 – Planned Projects and Progress as at 13/06/2014(*Original plan 1,200 days, balance of 331 represented by withdrawn audits)

3.5. A summary of delivery is shown below:

Delivery Status			
Total days in the plan	1248 days		
Number of days delivered to date	1236 days		
% of days delivered to date	99%		
Days to be delivered (Work in Progress)	12		
Total number of reports to be issued (excluding follow up reports and Committee reports)	83		
Number of reports / certifications issued to date	81		
% of draft and final reports issued to date	98%		
Number of final reports issued	59		
% of reports finalised	71%		

Table 2 – Delivery Status as at 13/06/14

- 3.6. In relation to audit work replaced during the year, as set out at appendix 2, this represent approximately 25% of the original plan. No formal analysis has been undertaken on the reasons for this and no benchmarking information has been obtained to establish whether or not this is unusually high. There are a number of possible explanations:
 - A number of system planned to be implemented in year did not go ahead as planned, such as one oracle;
 - Management requesting deferral of audits for convenience, i.e. school bursar not on post;
 - Coverage being achieved through other means, i.e. proactive anti-fraud work (i.e. GPC cards);
 - Change in lead officer in service with different view of risk

4. Housing Benefit Fraud

4.1. Caseload information is set out in table three below. Please note that 'Referrals' refer to

cases received between 1st April 2013 and 31st March 2014; 'Investigated' and 'Closed' include cases where referrals were received in previous years but for which the investigations were completed in the current year. This means that 'Investigated' and 'Closed' cases will often be a higher figure than 'Referred' cases.

4.2. In summary, the team has completed full investigations into 109 cases and identified fraud in 67 of these. 26 individuals have been prosecuted and 20 have had an administrative penalty applied (of up to 30% of the value of the overpayment in addition to the overpayment). Overpayments are being recovered in these and 21 additional cases where no sanction was applied. The total value of HB/CTB fraud overpayments identified by the team is in excess of £1.1m.

HB Fraud	2013/14	20012/13			
Referrals	596	666			
Investigated	109	190			
Fraud Found	67	121			
Hit Rate	61%	64%			
Caution	0	0			
Admin Penalty	20	34			
Prosecution	26	28			
Total Sanctions	46	62			
Court Summons issued but person has absconded	3	4			
Overpayment Only	18	43			
Value of HB/CTB fraud	£1,140,000	£1,786,000			
Value of DWP fraud	£400,000	£666,000			
Total value of fraud	£1,540,000	£2,452,000			
Average HB/CTB Overpayment per fraud	£17,000	£14,800			
<u>T</u> Table 3 – HB / CTB Fraud 2013/2014					

4.3. The reduction in cases investigated (-40%) is due to a number of factors including a reduction in staff dealing with HB fraud, more complex enquiries and fewer multiple claim frauds (i.e. a single investigation involving multiple claims with each claim considered as an investigation for case statistics).

Housing Tenancy Fraud

4.4. Caseload information is set out in table four below. In summary the team have completed 222 investigations and recovered 46 properties, primarily as a result of identifying unlawful sub-letting.

Housing Fraud	2013/14	2012/13
Referrals	216	206
Investigated	222	222
Fraud Found	49	59
Recovered Property	46	57
Application refused	0	1
Property Size reduced	3	1

Table 4 – Housing Fraud 2013/14

Blue Badge Fraud

4.5. The Investigation Team deal with forged/altered badge cases and some misuse cases. Statistics are shown below.

Blue Badge	2013/14	2012/13
Referrals	22	28
Investigated	30	23
Fraud / Irregularity	26	10
Prosecution	10	2
Warning/Caution	16	8

Other External Fraud

4.6. This category includes all other external fraud/irregularity cases excluding those identified in tables' three to five.

Internal	2013/14	2012/13
Referrals	22	37
Closed	31	17
Investigated	25	9
Fraud / Irregularity	6	2
Prosecution	1	0
Overpayment Only	5	0

4.7. These cases included two relating to direct payments, one of which related to a fraud totalling £106,000 across two councils. This case was successfully prosecuted and was set for asset recovery, however the death of the fraudster whilst serving his sentence means that recovery is no longer deemed viable.

Internal Fraud

4.8. Internal fraud refers to fraud committed by employees, agency staff and staff in schools. For the purposes of this report, "fraud" includes instances of wilful theft, fraud, misappropriation and serious breach of financial regulations or corruption. Since the beginning of the financial year, 11 staff have been dismissed for the following reasons: Working and claiming benefit; working whilst off sick; false overtime claims (school); conflict of interest; illegal working and theft (contractor). Activity for the year to date is shown in table 7 below:

Internal	2013/14	2012/13
Referrals	55	47
Investigated	44	41
Fraud / Irregularity	16	18
Dismiss	11	5
Resign	2	10
Warning	2	2
No disciplinary action	1	1

Table 7 – Internal Fraud 2013/14

Single Fraud Investigation Service

4.9. The DWP have confirmed their intention to transfer housing benefit investigators from local government into the DWP. This will mean that the council will no longer have responsibility for Housing Benefit fraud. Brent has been advised that staff will transfer on 1st October 2014.

Audit Commission Publications

- 4.10. The Audit Commission has recently published two documents. The National Fraud Initiative: National Report June 2014 (<u>http://www.audit-commission.gov.uk/wp-</u> <u>content/uploads/2008/05/NFI-national-report-FINAL-11-June-2014.pdf</u>) provides an overview of the results of their most recent national data-matching exercise. This exercise matches various data sets from local authorities and other public bodies to identify potential fraudulent claims for benefits and housing and anomalies in payroll and creditor data. The last data match was undertaken in October 2012 and this report identifies that £144m in fraud has been identified as a result of the exercise with a further £59m from previous exercises being reported.
- 4.11. The council received 5,000 high priority matches. These are prioritised and investigated where appropriate. A number of investigations are currently ongoing. Results to date are summarised below:

Data Match	Number cases	Value of overpayment	National Totals
Pension payments continuing after death	5	£8,000	£76m
Staff working with no right to work	5	*£236,000	£10m
Payments to care homes continuing after death	3	£25,000	£2m
Duplicate Creditor Payments	1	£12,000	£5m
Total	14	£281,000	£203m

(*The Audit Commission value the overpayment as the total salary earned by the employee with no right to work)

- 4.12. The Audit Commission have also provided the council with a comparative analysis of Brent's results compared to the national survey of detected fraud in local government. A copy of this briefing has been sent separately to members. "Protecting the Public Purse Fraud Briefing 2013 Brent London Borough Council" sets out the council's individual results arising from the annual survey of fraud loss for 2012/13. This is the first year when individual extracts have been produced.
- 4.13. The key statistics from the report are summarised below:

Fraud Type	Brent	London Average
Housing Benefit Cases	121	153
Housing Benefit Overpayments	£1.8m	£0.9m
Average HB Fraud	£15,000	£6,000

Ctax Discount Cases	86	586
Ctax Discount Value	£89,000	£202,000
Average Ctax Discount removed	£1,000	£300
Social Tenancies Recovered	53	53
Blue Badge Fraud Cases	10	40
Internal Fraud Cases	9	10
Internal Fraud Value	£69,000	£302,000

- 4.14. The findings of this report reflect the policy decision to generally pursue a lower number of high value or more complex cases, resulting in fewer cases of HB and Council Tax fraud but with a higher value per case. The apparently low level of Blue Badge frauds may indicate that some authorities have reported upon all instances of identified misuse by their parking enforcement teams, whereas the council's return only included more serious cases dealt with by the Audit and Investigation Team.
- 4.15. Five London authorities have reported council tax discount fraud valued in excess of £0.5m. By comparison Brent's figures are relatively low at £86,000, relating to a proactive anti-fraud drive on irregular student council tax exemptions. Further research will be undertaken across London to establish the basis of these high returns.

5. Financial Implications

- 5.1. The total value of the audit contract with Mazars is £300,000 in the current year and is funded within the Audit and Investigations base budget. If the total number of audit days attributable to Mazars is less than the 905 days allocated, then the total amount paid will reduce accordingly.
- 5.2. Funding for Housing Benefit fraud is provided to the council via the main HB administration grant. The DWP have given no indication as to the amount of grant to be withdrawn following transfer of staff although have stated that grant will not be impacted in 2014/15.

6. Financial Implications

- 6.1. None
- 7. Legal Implications
- 7.1. None

8. Diversity Implications

8.1. None

9. Background Papers

- 1. Report from the Director of Finance and Corporate Services Draft Internal Audit Plan 2013/14, Audit Committee 30th March 2013
- 2. Audit Commission National Fraud Initiative: National Report June 2014

10. Contact Officer Details

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