

Counter Fraud Plan 2020/21

Introduction

This is the Counter Fraud Plan for 2020/21.

Objective

To ensure the resources of the Counter Fraud team are effectively targeted to achieve the aims of the council's anti-fraud policies.

Background

The Investigations team's work is split between reactive and proactive activity. Reactive work largely consists of referrals to the team from the Internal, Housing or External fraud types. Proactive activity is generated from within the service and can incorporate any of the reactive fraud types.

All referrals are risk assessed so that resources can be targeted efficiently. The overall counter fraud resource allocation for 2020/21 is as follows:

- **Housing** (including related proactive work)* = 50% (minimum), 570 days;
- **Internal / Whistleblowing**** = 15%, 170 days;
- **External***** = 15%, 170 days, and
- **Proactive** (including NFI, fraud awareness, raising team profile and any developing additional anti-fraud initiatives) **** = 20%, 225 days.

* **Housing** remains a key fraud risk area and includes unlawful subletting, non-residency, successions / false assignments, housing/homeless applications and Right to Buy. Housing proactive work will be included within the 50% where possible to assist with the fraud awareness/ raising profile objective. Ongoing proactive work will include our existing involvement with 'Gas Forced Entries', succession applications and Right To Buy applications for council tenancies, which has been demonstrated to be a good source of fraud detection and higher referral quality. NB: Info Sharing Agreements with Housing Associations/RSLs will be reviewed/renewed. We will review our working practices with these organisations as some now use private investigators, credit reference agencies and other fraud prevention systems to help recover their properties i.e. there is less reliance on LA fraud teams to investigate their tenants.

** **Internal / Whistleblowing** is almost impossible to predict and quantify due to its nature. A high priority, or more complex, case can quickly take up team resource e.g. serious financial irregularity or corruption allegation. The fraud type affects all areas of the council and will often take priority. In most cases, the decision to investigate will be taken regardless of what the initial intelligence suggests and as such, increased planning and managing client expectations becomes a significant factor. It is probable that during 2020/21, the time spent in this area will be higher than 15% especially with related plans for raising fraud awareness and team profile.

*** **External** will include Blue Badge, Council Tax, Business Rates and all application-based fraud types. The capacity to manage this area of fraud has historically been affected by the higher priority fraud types above. The team will be developing additional anti-fraud initiatives including other enhanced data-matching tools to prevent and detect fraud.

**** **Proactive** (including NFI, fraud awareness and developing additional anti-fraud initiatives). All the above fraud types are reactive and therefore difficult to quantify. The counter fraud plan will be predominantly made up of proactive activity based on known and intelligence led key fraud risk areas, fraud awareness/publicity plans, corporate risk register and Internal Audit delivery. Example 1: Housing Tenancy high-risk areas. Example 2: Staff Identity Checks in key service area in conjunction with fraud awareness plan. Example 3: specific proactive in Essential User Permits following internal audit completion. The proactive area will be the easiest to quantify in terms of a counter fraud plan e.g. planned Blue Badge operations, fraud awareness workshops / service engagement in key fraud risk areas and review-based proactive work (i.e. NFI).

IMPORTANT: It should be noted that due to the often confidential and sensitive nature of the team's work, a certain amount of activity cannot be published in advance.

Fraud Awareness Plan

The purpose of this section is to set out the draft Fraud Awareness Plan against the main Counter Fraud Plan for 2020/21. The objective is to raise awareness of the risk of fraud amongst officers, residents and members to help ensure that Brent's assets are adequately protected.

A refresh of the main anti-fraud policies was approved by the Audit Advisory Committee on 5th December 2017. This has enabled the Counter Fraud team to promote these policies amongst all stakeholders to increase awareness, generate better quality referrals and raise the team's profile.

A significant amount of engagement is already underway, which includes workshops with all service areas and updating the content of our intranet and internet pages. The plan will be reviewed each quarter and amended accordingly.

The main anti-fraud policies are; (a) Anti-Fraud, Bribery and Corruption Policy, (b) Anti-Money Laundering Policy and (c) Whistleblowing Policy.

Related policies; (a) Disciplinary Policy, (b) Staff Code of Conduct, (c) Conflicts of Interests Policy and (d) Financial Regulations (and related guidance). These include the equivalent policies and regulations relating to schools.

Activity	Description	2020/21 Qtr	Planned / Update
Policies	Update anti-fraud policies on intranet and internet pages including related content.	-	Completed 2019/20 Q1.
E-learning	New starter induction – review current e-learning mandatory course.	Q1-Q2	There is an existing anti-fraud e-learning course for new starters, the content of which needs to be reviewed and refreshed.

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	Existing staff – consider introduction of an annual e-learning mandatory course.		Not started (as above). Plan to implement by end Q2.
Website	Review content within both intranet and internet pages.	-	Completed 2019/20 Q2.
Fraud Risk Awareness Workshops	Deliver fraud awareness sessions / workshops throughout council service areas, schools and other stakeholders.	Q1-Q4	<p>A programme of workshops and awareness sessions delivered by the Counter Fraud team started in 2018/19. This has covered main service areas, members and schools.</p> <p>The plan is to continue to deliver sessions to key service areas and stakeholders.</p> <p>NB: This also includes joint refresher workshops with Legal to deliver sessions on fraud risks and how to use social media in accordance with council policy.</p>
Yammer	<p>Increased presence on Yammer.</p> <p>Publish appropriate investigation outcomes.</p> <p>Publicise fraud alerts / guidance.</p> <p>Online workshops / group chats and advice on anti-fraud related matters.</p>	Q1-Q4	<p>Counter Fraud activity, guidance, alerts, and key case outcomes are published regularly.</p> <p>Yammer will continue to be used to deliver key messages.</p>
Technology	Consider new technologies to prevent / detect fraud.	<p>Q1-Q2</p> <p>Q1-Q2</p> <p>Q1</p> <p>Q2</p> <p>Q1-Q2</p>	<p>INTEC i-Latch (housing – tenancy checker) – under review.</p> <p>GBG Connexus – Visualise system (identity checker) – under review.</p> <p>GBG ID Scan - Scannet (ID authentication). Four machines to be installed at the council.</p> <p>Cifas NFD / IFD (anti-fraud databases). The NFD system was introduced in 2019. IFD is the internal anti-fraud system that is under review with a plan to introduce this year.</p> <p>INTEC IDIS / NFI AppCheck (using internal data matching with credit reference data). Both applications are being reviewed to consider implementation later this year.</p>
Service Engagement	Team / Service meetings	Q1-Q4	Representation at Committee, CMT, DMT, service / team meetings.

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			We are actively encouraging A&I presence at service / team meetings where appropriate.
Advice	Provide an advisory service	Q1-Q4	<p>Encourage teams to approach for advice and guidance in relation to fraud risks.</p> <p>Take proactive approach to assist with new procedures / process in other service areas, to mitigate fraud risks.</p>
Collaboration	Enhance closer / joint working.	Q1-Q4	Set up workshops with key partner teams such as HR, Legal, Housing, Parking and other regulatory/enforcement teams to improve joint working, closer collaboration, share best practice and increase understanding of fraud risks.
Publicity	Public awareness	Q1-Q4	Review poster / newsletter campaign to communicate Brent's approach to fraud and means of reporting suspected fraud.