

## **Appendix B: Annual Counter Fraud Plan 2021/22**

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### **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 work of the Investigations team 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 in response to a range of fraud risks 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 2021/22 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. 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.

By Q3 the team is planning to recruit two Trainee Counter Fraud Officers on a two year fixed term/ secondment basis to assist with tenancy fraud and other lower level external type investigations, intelligence and proactive activity. The new recruits will enrol onto the new Counter Fraud Apprenticeship, which will provide access to national membership of the Government Counter Fraud Profession at practitioner level.

\*\* **Internal / Whistleblowing** is difficult to predict and quantify due to its nature. A high priority, or more complex, case can quickly take up resource. The fraud type can affect any area of the Council and will often take priority. It is possible that, during 2021/22, 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 other 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). 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.

## Fraud Awareness Plan

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.

This Counter Fraud team promote the anti-fraud policies amongst all stakeholders to increase awareness, generate better quality referrals and raise the team's profile.

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

Activity	Description	2021/22 Qtr	Planned / Update
Policies	Update anti-fraud policies on intranet and internet pages including related content.	Q3	Previously undertaken 2019/20.
E-learning	New starter induction – review current e-learning mandatory course.  Existing staff – consider introduction of an annual e-learning mandatory course.	Q1-Q3	There is an existing anti-fraud e-learning course for new starters, the content of which will be reviewed and refreshed.  Not started (as above). Plan to implement by end Q2.
Fraud Risk Awareness Workshops	Deliver fraud awareness sessions / workshops across council service areas, schools and other stakeholders.	Q1-Q4	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.  We will continue to deliver sessions to key service areas and stakeholders.
Yammer	Increased presence on Yammer.  Publish appropriate investigation outcomes.  Publicise fraud alerts / guidance.  Online workshops / group chats and advice on anti-fraud related matters.	Q1-Q4	Counter Fraud activity, guidance, alerts, and key case outcomes are published regularly.  Yammer will continue to be used to deliver key messages.
Technology	Consider new technologies to prevent / detect fraud.	Q1 Q1 Q1 Q1-Q2	INTEC IDIS (internal and credit reference data matching). GBG Connexus – Visualise system (identity checker) – under review. GBG ID Scan - Scannet (ID authentication). Four machines to be installed. Cifas NFD / IFD (anti-fraud databases). The NFD system was

		Q1-Q2	<p>introduced in 2019/20. IFD is the internal anti-fraud system that is under review with a plan to introduce this year.</p> <p>NFI AppCheck (using internal data matching with credit reference data). Under review to consider implementation later this year for all council services to utilise as part of verification.</p>
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	<p>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.</p> <p>Working closely with Brent Housing Management to prevent / detect tenancy fraud and representation on the Tackling Tenancy Fraud Board to develop its action plan. This includes providing fraud awareness workshop for staff, developing processes, access to anti-fraud systems and increasing relevant skill sets within BHM.</p>
Publicity	Public awareness	Q1-Q4	<p>Review media campaign to communicate Brent's approach to fraud and means of reporting suspected fraud where appropriate.</p>