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Annual Counter Fraud Plan – 2022-23

Objective

Fraud remains an area of inherent risk to the Council. The objective of the Counter Fraud Plan is to ensure resources of the Counter Fraud Team are effectively targeted and deployed to prevent and detect fraud in accordance with the Council's anti-fraud and corruption policies.

Background

A best practice and proactive approach is to counter fraud through prevention and detection activities. The work of the Counter Fraud Team is therefore split accordingly between reactive and proactive activity.

Reactive activity largely comprises of referrals to the team in relation to internal, housing or external fraud types.

Proactive activity is generated from within the team in response to a range of known and/or emerging fraud risks, and also incorporates issues flagged by the Internal Audit service. Proactive activities include data matching reviews, fraud workshops, targeted operations and other planned fraud risk reviews across all service areas.

All fraud referrals are subject to a robust risk assessment to ensure that resources are targeted and utilised effectively and efficiently. For 2022/23 the Counter Fraud Plan will deliver 1,135 days, with resources allocated as summarised in the table below:

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Ref	Fraud Type	Description	Planned Days	%
AF22-1	Housing	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 an effective source of fraud detection and higher referral quality.	570	50% <i>(minimum)</i>
AF22-2	Internal/ Whistleblowing	It is difficult to predict and quantify resources for internal/whistleblowing referrals due to their 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 2022/23, the time spent in this area will be higher than 15% especially with related plans for raising fraud awareness and team profile.	170	15%
AF22-3	External	External fraud' includes all external fraud / irregularity that affects the Council. This will include (but is not limited to) fraud cases involving; Blue Badge, Direct Payments, Council Tax, Business Rates, insurance, finance, concessionary travel and grant applications.	170	15%
AF22-4	Proactive	Proactive activities include data matching reviews, fraud workshops, targeted operations based on known intelligence, and other planned fraud risk reviews across all service areas.	225	20%

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Fraud Awareness Plan

The objective of the Fraud Awareness Plan is to raise awareness of the risk of fraud amongst officers, residents and members to help ensure that Brent's assets are adequately protected. The Counter Fraud team promote the anti-fraud policies amongst all stakeholders to increase awareness, generate better quality referrals and raise the team's profile.

A number of engagements are already underway, including workshops with service areas and updating the content of our intranet and internet pages. The plan, as set out below, will be reviewed each quarter and amended accordingly.

Activity	Description	Planned Quarter	Activity Summary
Policies	Update anti-fraud policies on intranet and internet pages including related content.	Q1-Q2	Previously undertaken 2020/21.
E-learning	New starter induction – review of current e-learning mandatory course. Existing staff – re-introduction of an annual or biennial e-learning mandatory course.	Q1 Q1-Q2	The existing anti-fraud e-learning course for new starters has ended in Q3 2021-22, new content has been reviewed and awaiting a go-live date from the Learning & Development team. Plan to implement during Q1 once new Fraud Prevention and Anti-Bribery e-learning courses go-live.
Fraud Risk and 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 covers all service areas, members and schools. We will continue to deliver sessions to key service areas and stakeholders.

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Activity	Description	Planned Quarter	Activity Summary
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	<p>Consider and introduce new technologies to prevent / detect fraud.</p>	<p>Q1-Q4</p> <p>Q1-Q4</p> <p>Q1</p>	<p>INTEC IDIS (internal and credit reference data matching). Introduced during 2021/22. The system can match any council datasets against various parameters to prevent/detect fraud and error.</p> <p>GBG ID Scan - Scannet (ID authentication). Four scanners installed Q2 2021/22.</p> <p>Cifas NFD / IFD (anti-fraud databases). The NFD system was introduced in 2019/20. IFD is the internal anti-fraud system that is under review to introduce this year.</p> <p>NFI AppCheck and NFI FraudHub (using internal data matching with credit reference data). Under review to consider implementation this year for all council services to utilise as part of verification and fraud prevention.</p>
Advice	<p>Provide an advisory service</p>	Q1-Q4	<p>Encourage teams to approach for advice and guidance in relation to fraud risks.</p>

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			Take proactive approach to assist with new procedures / process in other service areas, to mitigate fraud risks.
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> <p>A new working group was set up in Q4 2021/22 to bring key stakeholders together and meet regularly to address fraud and safeguarding risks relating to financial assessments across Adult Social Care.</p>
Publicity	Public awareness	Q1-Q4	Review media campaign to communicate Brent's approach to fraud and means of reporting suspected fraud where appropriate.