Annual Counter Fraud Plan

2025-26

A. Introduction and Objectives

The objective of the Counter Fraud Plan is to ensure that the resources of the Counter Fraud Team are effectively targeted and deployed to prevent and detect fraud. The plan is underpinned by the Anti-Fraud and Bribery Policy and the Whistleblowing Policy, which set out the approaches and strategies that have been developed and established to tackle fraud and corruption.
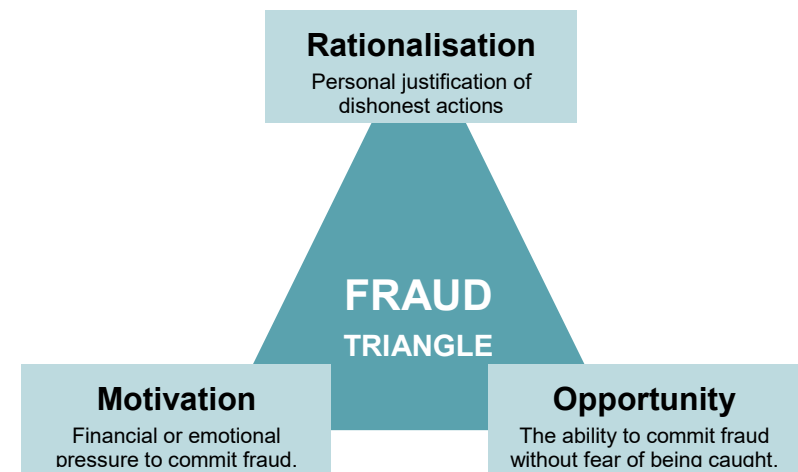
The plan is also prepared in consideration with the Fighting Fraud and Corruption Locally Strategy, produced by the Fighting Fraud and Corruption Locally initiative, a partnership between local authorities and key stakeholders.

B. Background and Context

All local authorities continues to face a significant fraud challenge. The tackling of fraud therefore remains a high priority to ensure that every penny is invested in delivering high quality services to residents.

In recent times, the impacts of the Covid-19 pandemic and the cost of living crisis have further exacerbated the challenges the Council faces from fraud and corruption. Combined with the continued pressure and strain on the Council's resources, this has continued to create an ideal environment for fraudulent activity where all elements of the 'fraud triangle', in which fraud thrives, have been heightened.

The increased risk of fraud is therefore clear, and as a Council we must ensure that we remain proactive in looking for and identifying fraud, whilst embedding a counter fraud culture at the heart of the organisation.

Rationalisation
Personal justification of dishonest actions

FRAUD TRIANGLE

Motivation
Financial or emotional pressure to commit fraud.

Opportunity
The ability to commit fraud without fear of being caught.

C. Approach

The Council takes a well-developed approach to tackling fraud and corruption. A best practice and proactive approach is to tackle fraud through a combination of prevention and detection activities. The work of the Counter Fraud Team is therefore split accordingly between reactive and proactive activity.

➢ *Reactive activity -* largely comprising of referrals to the team in relation to internal, housing or external fraud types. All fraud referrals are subject to a robust risk assessment to ensure that resources are targeted and utilised effectively and efficiently

➢ *Proactive activity -* 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.

Our approach and strategy is also aligned with the following five pillars set out within the Fighting Fraud and Corruption Locally Strategy:

Govern	Acknowledge	Prevent	Pursue	Protect
Having robust arrangements and executive support to ensure antifraud, bribery and corruption measures are embedded throughout the organisation.	Accessing and understanding fraud risks. Committing the right support and tackling fraud and corruption. Demonstrating that it has a robust anti-fraud response. Communicating the risks to those charged with Governance .	Making the best use of information and technology. Enhancing fraud controls and processes. Developing a more effective anti-fraud culture. Communicating its' activity and successes.	Prioritising fraud recovery and use of civil sanctions. Developing capability and capacity to punish offenders. Collaborating across geographical and sectoral boundaries. Learning lessons and closing the gaps.	Recognising the harm that fraud can cause in the community. Protecting itself and its' residents from fraud.

D. Counter Fraud Plan 2025-26

For 2025-26 the Counter Fraud Plan, resources will be allocated and prioritised across the following fraud types.

Fraud Type	Description	Approx % of time
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, including involvement with 'Gas Forced Entries', succession applications and Right to Buy applications for council tenancies.	30%
Internal/ Whistleblowing	Internal fraud includes whistleblowing referrals and a wide-range of case types ▪ Breach of financial / other regulations; ▪ Bribery and corruption; ▪ Fraudulent claims / allowances; ▪ External offences/conduct by staff; and ▪ Recruitment irregularities.	20%
External	External fraud' includes all external fraud / irregularity that affects the Council. This will include (but is not limited to) fraud cases involving: ▪ Payments; ▪ Blue Badge; ▪ Direct Payments; ▪ Council Tax/ Business Rates; ▪ Insurance; ▪ Finance, concessionary travel and grant applications.	30%
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. A proactive plan for 2025/26 will identify and cover the key risk areas for the council based on known intelligence and perceived risks, and in conjunction with Internal Audit, FFCL Strategy, and input from key stakeholders.	20%

E. 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.

The plan, as set out below, will be reviewed each quarter and amended accordingly.

Activity	Description
Policies and Procedures	Maintain and update anti-fraud policies on intranet and internet pages including related content.
E-Learning	Maintain, update and facilitate the e-learning module for new starters and existing staff.
Fraud Risk and Awareness Workshops	Deliver fraud awareness sessions / workshops across council service areas, schools and other stakeholders.
Technology	Consider, evaluate and introduce cost-effective new technologies to prevent / detect fraud.
Consultancy and Advice	To work in collaboration with and provide consultancy and advice to all of the Council to develop and implement better controls to prevent and detect fraud.
Publicity	Utilise internal and external communication channels to promote Brent's zero-tolerance approach to fraud and corruption. To also use these channels as a means of reporting successful fraud outcomes, where appropriate.