**Appendix 6 - Progress against the Corporate Anti-Fraud & Corruption**

**Strategy 2016-19**

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| **Action** | **Implementation date** | **Progress update** | **RAG rating** |
| Identify and assess Harrow’s fraud risk exposure affecting the principle activities in order to fully understand changing patterns in fraud and corruption threats and the potential harmful consequences to the authority and our customers | Complete in June annually | Achieving. This is undertaken each year when drafting the annual fraud plan for the coming financial year. | Green |
| Development of a fraud risk register to be integrated into the existing risk management framework, where significant fraud and corruption risks will be owned and maintained by the directorates | June 2017 | Partially achieving. The consultation required to develop the draft fraud risk registers has been more detailed and has taken longer than expected but the authority is now in a position to be taking fraud risk register summary to GARMS in July 2018. | Amber |
| To be an active participant in the bi-ennial National Fraud Initiative (NFI) exercise and to robustly investigate suspected cases of fraud identified through NFI. The Corporate Anti-Fraud Team are responsible for the co-ordination of the exercise including ensuring that the data sets comply with specification and are securely uploaded to the Cabinet Office. Management are responsible for the review of matches that are returned and for referring suspicions of fraud and corruption to the Corporate Anti Fraud Team | October 2016 & October 2018 onwards | Achieving. The authority continues to be part of the NFI and ensure that data is uploaded on time and work processed on a risk basis. | Green |
| Raise awareness of fraud and corruption both within the authority and in the community through running awareness campaigns and the publication of fraud successes in local and national media, including the use of all forms of social media | Ongoing throughout the duration of the strategy | Achieving. The authority is continuing to raise awareness of fraud and corruption both internally and in the community. Further details can be found in the annual mid-year and year-end reports. | Green |
| Actively seeks to increase the Council’s resilience to fraud and corruption through fraud awareness by ensuring that all **existing** employees in all directorates undertake a fraud & corruption e-learning course | By March 2019 | Not achieving. There have been scorm compliancy difficulties in establishing the e-learning package on the learning and development platform and currently it is not capturing the user completion details nor issuing a completion certificate. Further exploratory work is required before an awareness campaign can be launched to encourage new employees to complete it. | Red |
| |  | | --- | | Actively seeks to increase the Council’s resilience to fraud and corruption through fraud awareness by ensuring that all **new** employees in all directorates undertake a fraud & corruption e-learning course | | June 2017 | Not achieving. As above. | Red |
| By launching and publicising our strategy raise awareness of fraud and corruption with Senior Managers and Elected Members through a combination of e-training, newsletters and face to face fraud awareness development sessions where appropriate | April 2017 | Partially achieving. The strategy was communicated to Members and Senior Managers and the development of the fraud risk register has served to highlight the importance of fraud and corruption within the authority. Member awareness sessions are planned for 2018/19 and Chief Executive Newsletters will be used to raise awareness. | Amber |
| To refresh the fraud awareness pages on the Hub/Website | September 2017 | Achieving. The fraud web pages are refreshed at least annually. | Green |
| To refresh and promote the Council’s suite of anti-fraud related policies and procedures and to ensure that they continue to be relevant to national guidance, e.g. CIPFA Code of Practice on Managing the Risk of Fraud and Corruption | December 2017 | Not achieving. This review will be picked up during 18/19. | Red |
| To actively maintain the authorities’ membership of the National Anti-Fraud Network (NAFN), the London Borough of Fraud Investigators Group (LBFIG), The Chartered Institute of Public Finance and Accountancy (CIPFA), the London Fraud Hub and all other enforcement partners including the Police, The Border Force and HMRC. Also to be open to new and innovative anti-fraud projects | Ongoing throughout the duration of the strategy | Achieving. The authority continues to explore new ways of working in relation to combatting fraud and corruption and work closely with enforcement partners. | Green |
| To produce fraud investigation outcome reports for management which highlight the action taken to investigate the fraud risks, the outcome of the investigations e.g. sanction and recommendations to minimise future risk of fraud | Ongoing throughout the duration of the strategy | Achieving. The team issued 31 fraud risk recommendations during 17/18 and a process to track their implementation will be developed in 18/19. | Green |
| To explore with Human Resources the possibly of including management responsibility for managing fraud and corruption risks within all managerial role profiles | September 2017 | Not achieving. Further discussions are required with Human Resources on this matter around feasibility. | Red |

**Analysis of actions**

Eight (67%) of the actions contained within the strategy have been achieved or partially achieved, leaving four yet to be achieved (33%). The majority of the actions were front loaded in terms of implementation date so whilst they have not met projected milestones, overall, the strategy is on target to be achieved. Looking back, the implementations dates should have been more evenly spaced out throughout the duration of the strategy.