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

Strategy 2016-19

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	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

returned and for referring suspicions of fraud and corruption to the Corporate Anti Fraud Team			
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	Ongoing throughout the	Achieving. The team issued 31 fraud risk	Green

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	duration of the strategy	recommendations during 17/18 and a process to track their implementation will be developed in 18/19.	
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.