HARROW COUNCIL

Corporate Anti-Fraud Team Year-End Report 2018/19

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Introduction

This report outlines the corporate anti-fraud work carried out for the year ended 31/03/19. The plan is risk based and developed through consultation internally and drawing upon external sources of data to ensure that where possible best practice is followed (see CIPFA Fraud Code Self-Assessment below) and fraud resources are targeted at those areas of the authority deemed to be of highest risk to fraud with the greatest potential negative financial impact and/or reputational damage. The plan is approved by the Governance, Audit, Risk Management & Standards Committee (GARMS) annually and mid-year and year end progress reports provided against the plan to provide a level of assurance around the authorities' fraud risk resilience capability.

Summary of Outcomes

A summary of key outputs from the programme of corporate anti-fraud work for the year is recorded in the table below. Of the 15 work streams contained within the plan, 2 (13%) were exceeded, 9 (60%) have been achieved (of which 2 are ongoing), 2 (13%) partially achieved and 2 (13%) not achieved and carried over to the 2019/20 plan. All 5 key performance indicators were exceeded.

The level of fraud and corruption identified impacting the authority for 2018-19 at the year-end amounts to in excess of £3.3 million which represents an approximate return on investment for the team's running costs of just over 13:1.

	Fraud work stream	2018-19 Year End outcome
1	Corporate fraud risk assessment 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	Achieved Complete in Q4 as part of the development of the annual plan for 2019-20. The risk assessment draws upon information held both within the authority and external data including findings from the fraud risk register development, known and actual fraud identified in previous years and a review of national reports.
2.	CIPFA Fraud Code Self-Assessment Undertake an annual self-assessment against the CIPFA Code of Managing the Risk of Fraud & Corruption to measure resilience and progress made	Achieved The self-assessment against the CIPFA code for Managing the Risk of Fraud & Corruption in 2015/16 assessed the authority at 54% compliant reaching an adequate level of performance against the code. An action plan was drafted to improve the resilience and these actions have featured in both the strategy and the annual planning process. Further self-assessments against the CIPFA Code were undertaken in 2017/18 and 2018/19 which resulted in the compliance level improving to 75% and 78% respectively indicating that the authority has reached a good level of performance against the code. Assessment against the code will continue to be undertaken annually.
3	Corporate fraud risk register	Achieved
	Finalise, co-ordinate, review and facilitate the updating of the fraud risk register where significant fraud and corruption risks are identified, mitigated, monitored and update at least annually	The fraud risk register has been developed through consultation with management and has fed into the drafting of the annual fraud plan for 2019/20. The register will be reviewed during the year so that it reflects accurately the fraud risks the organisation faces and allows resources in the CAFT to be directed at areas of greatest risk to fraud where financial losses are greatest and where there is potential for significant reputational damage.
4	Corporate Anti-Fraud & Corruption Strategy	Achieved and ongoing
	Review the Corporate Anti-Fraud & Corruption Strategy 2016-19 that links to Harrow's corporate priorities, the overall goal of improving resilience to fraud and corruption and fully reflecting the fraud and corruption risks faced by the authority	The authorities' current Corporate Anti-Fraud & Corruption Strategy 2016-19 has been reviewed and no changes made, however, the Fighting Fraud & Corruption Locally Strategy Board (FFCL) are at present reviewing the strategy for Local Government and therefore, it would be prudent to await the strategy refresh before amending the authorities' strategy to ensure it remains closely aligned.

	Fraud work stream	2018-19 Year End outcome		
5.	Establish a fraud loss methodology	Not achieved – carried forward		
	Develop and implement a fraud loss value methodology to apply consistently to significant fraud risk exposures enabling fraud losses to be measured accurately	The task was not complete due to vacancies on the team impacting capacity. The task was carried forward to the 2019/20 plan.		
6.	National Fraud Initiative co-ordination role	Achieved and on going		
	Co-ordination of the 2018/19 National Fraud Initiative (NFI) data match processing including:-	All service areas contributing data had compauthorities' key contact to complete the GDF All required data was extracted from core sy	PR fair processing compliance certification on time.	
	Ensuring the authority complies with fair processing guidelines required to submit data into the exercise in	All required data was uploaded securely via the Cabinet Office portal on time Services processing the matches are making good progress after they were released in		
	accordance with timescales so as to be compliant with GDPR	February 2019. A brief summary of progres		
		Housing Benefit	Creditors historical	
	Supports service areas in extracting	Total matches 2014	Total matches 5495	
	the data from core systems in the	Total processed 101	Total processed 91	
	required specification in accordance with timescales	In progress 24 Value of fraud & error identified £nil	In progress 2 Value of fraud & error identified £nil	
	Upload the data securely onto the	Creditors standing	Council Tax Reduction Scheme (CTRS)	
	Cabinet Office NFI portal and in	Total matches 435	Total matches 1333	
	accordance with timescales	Total progressed 27	Total processed 41	
		In progress 1	In progress 5	
	 Liaise with service areas when the 	Value of fraud & error identified £nil	Value of fraud & error identified £8,591.91	
	datamatches are released back to	Haveing Tananta	Dana anal hudusta	
	authority in January 2019 to ensure	Housing Tenants	Personal budgets	
	that action is commenced promptly on	Total matches 139	Total matches 86	
	those matches that are deemed to be	Total progressed 136	Total progressed 62	
	high risk	In progress 1 Value of fraud & error identified £nil	In progress 23 Value of fraud & error identified £nil	
		value of fraud & error identified £ffill	value of fraud & effor idefittified Lifti	

Procurement

Total matches 124
Total processed 50
In progress 0

Value of fraud & error identified £nil

Pensions

Total matches 219 Total processed 207

In progress 5

Value of fraud & error identified £6,522.36

Payroll

Total matches 199
Total processed 176
In progress 0

Value of fraud & error identified £nil

Right to Buy

Total matches 3 Total processed 3 In progress 0

Value of fraud & error identified £nil

Private residential care homes

Total matches 35 Total processed 25 In progressed 0

Value of fraud & error identified £12,086.70

Residents parking permits

Total matches 8 Processed 0 In progress 0

Value of fraud & error identified £nil

Waiting list

Total matches 316 Total processed 257 In progress 0

Value of fraud & error identified £683,640¹

Blue badge parking permit

Total matches 507 Total processed 507 In progress 332

Value of fraud & error identified £100,625.0²

Overall fraud savings attributed to this work stream is £811,465.90

¹ Notional cost of removing 1 case from the waiting list following a match is £3240 as per Cabinet Office guidance

² Notional cost of recovering a blue badge out of circulation registered to a deceased individual is £575 as per Cabinet Office guidance

	Fraud work stream	2018-19 Year End outcome
7.	Corporate anti-fraud awareness	Partially achieved
	Raise awareness of fraud and corruption risks both within the authority and in the community through the publication of fraud successes in local and national media, including the use of all forms of	The e-learning package is now stable in the learning pod platform and an awareness campaign commenced in Q4 with the support of the Learning & Development Team including fortnightly emails to managers, weekly mentions in Newsletters and the course will be placed on the L&D homepage.
	social media including the following actions:-	CAFT & Internal Audit attended the <i>New Members Market Place</i> event on 14/05/18 to raise awareness of both fraud and Internal Audit roles. Fraud awareness training for members will be explored in 2019/20.
	Embed fraud E-learning to existing employees	Raising fraud awareness in school did not take place due to vacancies on the team impacting capacity.
	Elected Member fraud	No fraud articles featured in the Chief Executive Newsletters during the year.
	awareness trainingRaising fraud awareness in	Web and hub pages were refreshed in Q2. The E-fraud referral forms were updated in Q4 and work continues as the authority moves over to a new website in 2019/20.
	schools in conjunction with Internal Audit's annual programme of planned works	In total, 23 fraud risk recommendations contained within investigation reports have been made to management and 20 have been agreed for implementation.
	Chief Executive Newsletter	KPI5 target 60%, achieved 87% (20/23) at year end.
	 articles on fraud and corruption CAFT Hub/web pages review and refresh 	16 fraud risk workshops were delivered to 120 housing needs and adult social care staff, equipping them with tools to be able to spot fraud indicators in relation to their own area of work, to seek support and advice from the CAFT where appropriate and to refer cases for investigation.
	 Issuing management reports detailing investigation outcomes and recommendations for improving fraud risk controls are implemented if agreed according to risk (KPI5) 	 Harrow People Spring, Summer & Autumn editions 2018 ran a graphic and figures around Housing fraud and the results that the authority had achieved in combatting it during 17/18. Fraud results for 17/18 appeared in Housing Services Smarter Housing Plan 2018-19 published in May 2018. An anti housing fraud pull up banner has been placed in Access Harrow Reception in
	Deliver fraud risk workshops/CAFT attendance at team meetings for high fraud	 Q1 – Q4, encouraging customers to report anyone they suspect of committing housing fraud against the authority. A Council <u>press release</u> was issued in August 2018 (including social media) in relation

risks areas

- Publicity through all forms of media on successful fraud cases, fraud initiatives and related prosecution outcomes
- Design and delivery of an antifraud week to raise awareness internally and within the community

to a former employee of the Council who was successfully prosecuted and imprisoned for 3 years in August 2018 for defrauding the authority out of £100,000. The case received other local media coverage.

Anti-fraud awareness week was not carried out due to vacancies on the team impacting capacity. The task will be carried forward to the 2019/20 plan.

8. Fraud liaison

Explore, develop and maintain effective liaison with investigation teams in other boroughs and external agencies and ensure that membership and interest continues in the London Borough of Fraud Investigators Group (LBFIG), The National Anti-Fraud Network (NAFN), The Chartered Institute of Public Finance and Accountancy (CIPFA) and the proposed London Counter Fraud Hub

Achieved

The authority retained its membership of the National Anti Fraud Network (NAFN) for its essential role in intelligence gathering and the London Borough of Fraud Investigators Group (LBFIG). NAFN is an essential conduit for accessing 3rd party information sources which is vital for supporting investigation work.

Officers in the team have also attended a number of Counter Fraud Conferences during the year which is important to keep up to date of current fraud trends and emerging fraud risks.

Established partnerships with the Border Force, HMRC, the Home Office, the Metropolitan Police and other enforcement agencies have proven essential to current investigation work.

The authority continues to work with CIPFA and explore the proposed London Counter Fraud Hub and remains open to joining providing that the business case on the benefits and return on investment is cost effective and right for the authority.

	Fraud work stream	2018-19 Year End outcome
9.	Internal datamatching	Not achieved – carried forward
	Design and deliver an anti-fraud campaign using the iDIS data matching tool for the purposes of detecting, preventing and pursuing fraud and corruption	The task was not carried out due to vacancies on the team impacting capacity. The task was carried forward to the 2019/20 plan.
10	Housing fraud	Partially achieved
	Assess and investigate allegations of fraud and abuse in the housing system working in partnership with Housing Resident Services, Housing Needs and Harrow's RSL's including:	Tenancy recoveries exceeded Working in partnership with Housing Resident Services and Harrow's Registered Social Landlords (RSLs), 13 social housing tenancies were recovered resulting in notional fraud savings of £1,209.481. ³ Included in this total are 2 fraudulent succession's intercepted (involving Council tenancies) and 2 Registered Social Landlord properties.
	Seek to recover 12 social housing units subject to fraud & misuse (KPI1)	KPI1 target 12, achieved 13 (108%) Savings subtotal achieved £1,209,481
	Prevent housing application fraud through a proactive fraud risk based targeted review of those customers in emergency accommodation	Housing Applications proactive exercise not commenced due to vacancies on the team impacting capacity. Objective carried over to 2019/20 plan A total of 18 housing application referrals have been received during the year at the mid-year
	Prevent fraudulent Right to Buy (RTB) applications through targeted application validation with a fraud check on 90% applications referred to	point and 4 applications have been intercepted for customers providing false or misleading information in support of the application resulting in notional savings of £135,000. Savings subtotal achieved £135,000 ⁴
	the CAFT at offer stage (KPI2)	RTB work stream exceeded
	Prevent mutual exchange, succession and assignment fraud through targeted application validation and	Working in partnerships with Leasehold Services, HB Public Law Services and Housing Management, 8 RTB applications were intercepted saving the authority £851,000 in terms of purchase discount losses prevented. ⁵

The notional value of tenancy recovery now £93,000 per unit according to the <u>Cabinet Office National Fraud Initiative Report 2016</u>

Notional savings amount based on the size of the property the applicant would have been allocated had they been successful.

The maximum RTB discount for 18/19 was £108,000 in London, but 4 results involved discounts that applied to the previous years' discount amount of £104,900.

working with the service area

- Work with Housing and Communications to run a housing fraud centric publicity campaign to raise awareness internally and the community including a key amnesty
- Maximise the use of powers contained within the Prevention of Social Housing Fraud Act 2013 (PoSHFA) in terms of gathering evidence, investigation and prosecution of offenders and recovery of unlawful profit

These outcomes are due to applicants failing anti-money laundering checks (proving the source of funds) or following CAFT consultation with the lenders, the mortgage offer being withdrawn. The team is continuing to make use of the National Hunter system allowing the authority to communicate with lenders lawfully for the prevention and detection of crime and referring cases where appropriate to the National Crime Agency (NCA).

KPI2 target 90%, achieved 100% at year end

Savings subtotal achieved £851,600

Mutual Exchange/Succession work stream achieved

2 applications by individuals to succeed to a tenancy were investigated by CAFT which resulted in housing rejecting them and possession was obtained. Savings have been included in the tenancy recovery work stream above.

Housing fraud centric publicity campaign achieved

A housing fraud pull up banner was placed in Access Harrow Reception in April 2018 encouraging members of the public to report tenancy fraud and a number of housing fraud adverts have appeared in Harrow People and Homing In magazines (see fraud awareness section above).

PoSHFA 2013 Powers work stream achieved

The authority has utilised powers contained within the above act through requests to the National Anti Fraud Network (NAFN) on 36 occasions this year.

If approved by NAFN, this enables the authority to access personal financial data held by the banks on individuals on cases of suspected tenancy sub-let, RTB and housing applications where there is doubt over the accuracy of the subject's account of events.

Overall fraud savings attributed to this work stream is £2,195.481

	Fraud work stream	2018-19 Year End outcome
11	Internal fraud & corruption	Exceeded
	Risk assess 80% allegations of internal fraud and corruption as a priority and	Of the 6 internal fraud referrals received all were risk assessed and resources allocated in 5 working days.
	deploy resources on those cases where there is corroborative evidence within an average of 5 workings days of receipt of	KPI3 target 80%, achieved 100%.
	the information (KPI3).	There have been 3 positive outcomes during the year.
		Employee 1 was dismissed during 2017/18 as a result of fraud and corruption investigations. The employee had diverted significant sums of Housing Benefit payments from live claims into accounts that they had some element of control over. They were successfully prosecuted in August 2018 and sentenced to 3 years imprisonment. Court costs of £22,000 were also awarded to the authority. There is a live proceeds of crime act (POCA) investigation into the recovery of losses amounting to £113,628.00 due to be heard in court in July 2019.
		Employee 2 was arrested in April 2018 and dismissed in June 2018 following misuse of company purchase cards resulting in salary savings of £19,890. The matter is still live under investigation by the Metropolitan Police and the CAFT is supporting the investigation.
		Employee 3 was dismissed in September 2018 following an investigation into misuse of Council equipment resulting in salary savings of £22,734. This investigation is still live.
		Overall fraud savings attributed to this work stream is £178,250
12	Revenues/Business Rates/Council Tax Support fraud	Achieved
	Work in partnership with Revenues and Benefits to investigate allegations of fraud and abuse on a risk basis of the Council Tax, Council Tax Support and Non Domestic Rates Systems, including	The team processed 8 referrals of Council Tax discount/exemption fraud, CTRS fraud and NNDR fraud. There have been 15 positive outcomes during the year mainly identified from linked investigations into tenancy fraud where the tenant was in receipt of a benefit/exemption/reduction but no longer occupied the address as their principle home. CTRS/CTB £27,538.52
	exemptions, discounts and reliefs, apply appropriate sanctions where fraud is proven and assist in the recovery of fraud related losses	HB £40,711.50 Overall fraud savings attributed to this work stream is £68,249.75

	Fraud work stream	2018-19 Year End outcome
13	Social care fraud	Achieved
	Work in partnership with the People Directorate to investigate allegation of fraud and abuse of the social care system including but not limited to:-	There have been 4 positive outcomes involving social care cases; 3 involving residential care home cases (2 deceased cases where the care home had failed to inform of the death which was identified via the National Fraud Initiative – see section 6 NFI) and 1 case where undeclared applicant capital was identified after an full investigation.
	 Personal budget applications, assessment and monitoring of spend 	A personal budget investigation resulted in the applicant being made full cost for care following an investigation that identified undeclared property ownership that the applicant's representative failed to disclose on the financial assessment.
	A proactive fraud risk based exercise in relation to those individuals being financially	A proactive fraud risk based exercise in relation to residential care financial assessments commenced in Q4 and of the 20 cases reviewed, 3 are live under ongoing investigation with suspicions that the applicant / representative have failed to disclose capital.
	supported in long term residential care	Overall fraud savings attributed to this work stream is £40,490.40
14	Partnership working	Achieved
	Responding to requests for information in a timely manner from our law enforcement partners e.g Police, HMRC, Other LA's etc	The team handled many requests for information from other law enforcement agencies to support their work and have maintained a positive working relationship with the Department for Work & Pensions, the Metropolitan Police and other forces in the UK, the UK Border Agency, Registered Social Landlords and other Local Authorities.
15	Risk assess allegations of fraud and corruption	Exceeded Of the 175 referrels received during the year, 145 (820/) were risk assessed and recourses
	Risk assess 80% of allegations of fraud and corruption and deploy resources on those cases deemed sufficiently high enough fraud risk within an average of 10 working days of receipt of the information.	Of the 175 referrals received during the year, 145 (83%) were risk assessed and resources deployed to those cases accepted for investigation within 10 working days. KPI4 target 80%, achieved 83%.
	(KPI4)	

Work Undertaken in Addition to the Plan

Fraud work stream	Target	2018-19 Year End outcome
Support the Concessionary Travel Team in the enforcement of the disabled parking blue badge scheme Provide advice, administrative support and to act as the single point of contact between the Blue Badge Fraud Investigation Service (BBFI) and the authority in blue badge enforcement work in the borough.	Q1-4	A 12 month pilot of blue badge enforcement work undertaken by a contractor; Blue Badge Fraud Investigation (BBFI) commenced in January 2018 funded by Concessionary Travel. Blue badge fraud risks, whilst potentially high in occurrence, did not feature as a significant fraud risk for the CAFT to make it onto the annual fraud plan. The CAFT therefore acted as the single point of contact for the authority and provided support to the BBFI, particularly around processing prosecution bundles assisting in interviews and instructing HB Public Law to commence prosecution proceedings. The pilot resulted in 17 successful prosecutions over the 12 month period. Overall fraud savings attributed to this work stream is £18,199.60

Performance of Corporate Anti-Fraud Team

Introduction

A number of Key Performance Indicators (KPIs) were agreed as part of the 2018/19 Corporate Anti-Fraud Plan and performance against these is set out in the table below:

No.	CAFT Key Performance Indicators 2018/19	Target	Mid- year	Year- end	Comments
1.	Recovery of 12 social housing units subject to fraud and misuse	100%	42%	108%	Exceeded 13 social housing units subject to fraud and abuse have been recovered including 2 intercepted succession applications and 2 RSL properties.
2.	Fraud validation checks undertaken on Right to Buy applications referred to the CAFT at offer stage and before completion	90%	100%	100%	Exceeded 26 Right to Buy applications received by the team during in the year all (100%) had anti money laundering checks carried out before purchase or were in progress before a decision made to accept or deny the purchase.
3.	Internal fraud and corruption referrals risk assessed and resources deployed in 5 working days	80%	100%	100%	Exceeded Of the 6 internal fraud and corruption referrals received by the team, all 6 (100%) were risk assessed and resources deployed within 5 working days
4.	Fraud and corruption referrals risk assessed and resources deployed in 10 working days	80%	84%	83%	Exceeded Of the 175 referrals received by the team during the year, 145 (83%) were risk assessed and resources deployed within 10 working days.
5.	Fraud risk recommendations agreed for implementation ⁶	60%	100%	87%	Exceeded Of the 23 fraud risk recommendations made by the team in reports, 20 (87%) were agreed for implementation by service areas

⁶ New KPI for 18/19

KPI Summary

This is the first occasion the team has met and exceeded all of the performance indicators having commenced the measurement in 2016/17. It has taken three years of building performance to achieve this outcome which is positive. The challenge now is to achieve stability and maintain this level of performance and once this is achieved, consideration can be given to making the indicators more challenging.

Fraud referrals, outcomes and savings summary

Fraud Risk Area	18/19 Q1 & 2	18/19 Q3 & 4
Housing application fraud		
Referrals	13	5
Positive outcomes	2	2
Savings	£54,000	81,000
Blue badge		
Referrals	35	13
Positive outcomes	10 (successful prosecutions)	7 (successful prosecutions)
Savings	£9,145 (inc notional savings, courts costs and fines) ⁷	£9,054.60 (inc notional savings, court costs and fines)
Fraud other		
Referrals	4	4
Positive outcomes	0	0
Savings	0	0
No Recourse to Public Funds		
Referrals	2	0
Positive outcomes	0	0
Savings	0	0
Revenues/CT/CTRS/HB		
Referrals	7	1
Positive outcomes	0	15
Savings	0	£68,249.75 ⁸

Harrow notional value of a blue badge positive outcome is £500
 15 overpayments of Council Tax Support, Council Tax Benefit and Housing Benefit identified as a result of a tenancy fraud investigation where the findings were shared with Housing Benefits

Internal		
Referrals	4	2
Positive outcomes	3 (2 employee dismissals and 1 successful prosecution of a former employee already dismissed)	0
Savings	£178,250	0
Right to Buy		
Referrals	11	15
Positive outcomes	4	4
Savings	£419,600 (4 x £104,900 RTB discounts prevented)	£432,000 (4 x £108,000 RTB discounts prevented)
Social care/grants		
Referrals	4	26
Positive outcomes	1	3
Savings	£24,360 (1 x residential care case)	£16,130.4 (1 x direct payment case prevented)
Tenancy		
Referrals	17	18
Positive outcomes	6	7
Savings	£558,000 (5 x tenancies recovered & 1 succession rejected)	£651,481.75 (6 tenancies recovered, 1 succession rejected and recovery costs)
NFI	·	, , , , , , , , , , , , , , , , , , ,
Positive outcomes		218
Savings		£811,465.9
Totals		
Referrals	97	84
Positive outcomes	26	256 (inc NFI cases)
Fraud Savings	£1,243,355	£2,069,382