**HARROW COUNCIL**

**Corporate Anti-Fraud Team Year End Report**

**2019/20**

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**Introduction**

This report outlines the corporate ant-fraud work carried out for the year 2019-20. 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 17 work streams contained within the plan, 12 (70%) were achieved, 2 (12%) were partially achieved and 3 (18%) were not achieved. 4 out of the 5 key performance indicators were achieved (80%) whilst 1 (20%) was not achieved.

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|  | **Fraud work stream** | **2019-20 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 | **Objective achieved**  This task is undertaken annually which feeds into the development of the annual plan for the following year. The adjusted annual plan for 2020-21 will be presented to the Committee in October 2020. |
| 2. | **CIPFA Fraud Code Self-Assessment**  Undertake an annual self-assessment against the CIPFA Code of Managing the Risk of Fraud & Corruption | **Objective achieved**  78% compliance with the code has been achieved which is a good level of compliance with the code which remains unchanged from 2018/19. Consideration will be given to drafting an action plan for Committee to consider on whether to implement if the authority is to continue to improve above 78% compliance |
| 3 | **Corporate fraud risk register**  Review and facilitate the updating of the fraud risk register annually where significant fraud and corruption risks are identified, mitigated and monitored | **Objective not achieved**  This was not achieved due to a lack of capacity, but this is mitigated somewhat with the corporate fraud risk assessment work completed annually that feeds into the development of the annual plan. |
| 4 | **Corporate Anti-Fraud & Corruption Strategy**  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. Timing of the review will depend on the completed review/refresh of the Fighting Fraud & Corruption Locally Strategy that is being undertaken in 2019/20 by the FFCL Board | **Objective not achieved due to timing of FFCL strategy release**  The Counter Fraud and Corruption Strategy for Local Government was published in April 2020 by the Fighting Fraud & Corruption Locally (FFCL) Board, but due to Covid-19 the official launch was delayed to October 2020. A review of Harrow’s Corporate Anti-Fraud & Corruption Strategy will be undertaken in 2020-21 so that it aligns to the new strategy. |

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|  | **Fraud work stream** | **2019-20 Year end outcome** |
| 5. | **Establish a fraud loss methodology**  Develop and implement a fraud loss value methodology to apply consistently to significant fraud risk exposures enabling fraud losses to be measured accurately | **Objective not achieved**  This was not achieved due to a lack of capacity on the team. The team uses best practice and established methodologies for most areas of fraud investigated, but not all. Consideration will be given to completing this task 2019-20 |
| 6. | **National Fraud Initiative co-ordination role**  Co-ordination of the 2018/19 National Fraud Initiative (NFI) data match processing including:-   * Supporting service areas to ensure matches are processed in a timely manner and that suspected fraud is referred for investigation * Processing matches which are the responsibility of the CAFT (Housing matches) * Investigate potential fraud cases referred and recommend sanction and/or corrective action on cases as appropriate | **Objective achieved**  Services have processed all high risk matches after they were released to the authority in February 2019. A brief summary of progress is detailed below:-   |  |  | | --- | --- | | **Housing Benefit**  Total matches 2639  Total processed 127  In progress 0  Value of fraud & error identified £122,216.06 | **Creditors historical**  Total matches 5495  Total processed 93  In progress 0  Value of fraud & error identified £0 | | **Creditors standing**  Total matches 435  Total progressed 28  In progress 0  Value of fraud & error identified £0 | **Council Tax Reduction Scheme (CTRS)**  Total matches 1889  Total processed 46  In progress 0  Value of fraud & error identified £13,197.81 | | **Housing Tenants (CAFT matches)**  Total matches 169  Total progressed 168  In progress 0  Value of fraud & error identified £0 | **Personal budgets**  Total matches 87  Total progressed 73  In progress 13  Value of fraud & error identified £0 | | **Procurement**  Total matches 124  Total processed 50  In progress 0  Value of fraud & error identified £0 | **Pensions**  Total matches 219  Total processed 219  In progress 0  Value of fraud & error identified £6,522.36 | | **Payroll**  Total matches 199  Total processed 183  In progress 0  Value of fraud & error identified £0 | **Right to Buy**  Total matches 3  Total processed 3  In progress 0  Value of fraud & error identified £0 | | **Private residential care homes**  Total matches 47  Total processed 45  In progressed 0  Value of fraud & error identified £12,086.70 | **Residents parking permits**  Total matches 8  Processed 1  In progress 0  Value of fraud & error identified £0 | | **Waiting list**  Total matches 316  Total processed 303  In progress 0  Value of fraud & error identified £706,320[[1]](#footnote-1) | **Blue badge parking permit**  Total matches 507  Total processed 391  In progress 116  Value of fraud & error identified £80,500[[2]](#footnote-2) |   There have been 11 NFI fraud referrals to the CAFT since April 2019, 7 have been closed no further action, 2 were closed as positive outcomes (CTRS cases) and 2 cases are still under investigation.      **Overall cumulative fraud savings attributed to this work stream is £940,842.93** |

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|  | **Fraud work stream** | **2019-20 Year end outcome** |
| 7. | **London Counter Fraud Hub (LCFH)**  Explore the membership of the London Counter Fraud Hub (LCFH) which may result in the authority participating in a pan London data matching exercise focusing on Council Tax Single Person Discount, Business rates and Housing Tenancy fraud. | **Objective achieved**  LCFH has now been rebranded the CIPFA Counter Fraud Hub and there have been some minor changes to the membership conditions. Nevertheless, it is unlikely that the authority will commit to joining whilst the projected return on investment does not make financial sense. |
| 8. | **Participate in a Cifas 6 month pilot membership**  Join a 6 month pilot membership of Cifas which is the UK’s leading fraud prevention service that facilitates the sharing of fraud data for the prevention and detection of crime across the public, private and third sectors. | **Objective achieved**  Cifas is a not for profit organisation run for members to securely exchange information about known frauds affecting their business to enable other members to protect themselves from fraud and corruption. Membership of Cifas allows organisations to both file frauds that reach an evidence threshold and to search the database at any time during a customer relationship to see if they are known to other members as fraudsters.  The authority was one of a few pilot sites launched in April 2019 and whilst accessing Cifas data has undoubtedly added value to the CAFT investigations in terms of intelligence gathering, there have been some challenges around sharing data and ensuring that data subjects are made aware that the authority is working with Cifas.  The CAFT is at present using the Cifas database to sift all cases that are referred for investigation (reactive) but the intention is to use the database more proactively and a) batch match sets of data on a risk basis to target areas of high fraud risk and b) to expand the access to Cifas to other services in the authority. Discussions were well advanced with both Insurance and Procurement services at the end of the year, but this has since stalled due to the Covid-19 emergency. The expansion of the Cifas system internally will be continued in the 2020-21 plan.  Given the long lead in time and nature of fraud investigation work, a decision was made by the pilot authorities and Cifas that the initial pilot period would be extended to March 2021 to allow a greater opportunity of casework throughput and for positive outcomes to be identified. |
| 9. | **Corporate anti-fraud awareness**  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 social media including the following actions:-   |  |  | | --- | --- | | * Embed fraud E-learning to existing employees * Chief Executive Newsletters and general internal communications bulletins in relation to articles on fraud and corruption * Issuing management reports detailing investigation outcomes and recommendations for improving fraud risk controls are implemented if agreed according to risk (KPI5) * Deliver fraud workshops/CAFT attendance at team meetings for high fraud risk areas as appropriate * Publicity through all forms of media on successful fraud cases, fraud initiatives and related prosecution outcomes |  | | **Objective partially achieved**  **E-learning**  The fraud e-learning package has been heavily promoted through internal communications and the course content has recently been updated to reflect current fraud risks facing Local Authorities.  **Chief Executive Newsletters**  There have been no Chief Executive Newsletters, internal communications or bulletins in relation to fraud articles up to the mid-year point.  **Management reports and briefing notes**  Intotal, 27 fraud risk recommendations contained within investigation reports and briefing notes have been made to management with 26 being agreed for implementation.  **KPI5 target 70%, achieved 96% (26/27).**  **Fraud Workshops**  CAFT have not delivered any fraud workshops this year.  **Publicity**  Harrow Council featured in a Cifas article about [Single Person Discount fraud](https://www.cifas.org.uk/newsroom/false-housing-benefit-claims?utm_source=http%3a%2f%2femail.cipfa.org.uk%2fcipfamiddlewarelz%2f&utm_medium=email&utm_campaign=CFC+NWS+VS+newsletter+OCT19+(16648-CIP)&utm_term=The+latest+articles%2c+news%2c+tips+and+events&utm_content=3786&gator_td=x2fH5mGCx%2fn%2f%2b9%2fLZOtZF9c0vuHePvQt3%2bJnf2XgyFGnr7c5l8segf72ht%2fg5vejcLJ6wKGCIeImMQOopovfwugN92dO3kJcAnnIl9PYO6Bps%2bz5iqt4oyBsNSgGZN%2bDB5vhfmYdbV%2b58abh1eBlA3lVhbqhCx2AzIO3BkD7YCmF6y29AIDzXaScty6dLs4Ma1y38xpMlC8zAIaVmNgoZ4hrIl0eZy1ZsgfXEjO9shU%3d) in September 2019 |
| 10. | **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 | **Objective achieved**  The authority renewed 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 joined Cifas in April 2019. See section 8. |

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|  | **Fraud work stream** | **2019-20 Year end outcome** |
| 11. | **Internal datamatching**  Design and deliver an anti-fraud campaign using the iDIS data matching tool for the purposes of detecting, preventing and pursuing fraud and corruption | **Objective achieved**  A housing tenancy fraud datamatch against credit bureau data was undertaken in Q3 where all current housing tenants were matched against credit bureau data to identify  a) those tenants that were credit active at addresses other than the tenancy,  b) those tenants that had no active credit footprint at the tenancy, and  c) those where individuals other than the tenant were credit active at tenancy indicating a sublet.  A total of 73 investigations were launched involving the case types mentioned above but no tenancy fraud has been identified to date with only 1 case still live under investigation |
| 12. | **Housing fraud**  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:   * Seek to recover 10 social housing units subject to fraud & misuse (KPI1) * Prevent housing application fraud through a proactive fraud risk based targeted review of those customers in emergency accommodation (placed outside of the borough) * Prevent fraudulent Right to Buy (RTB) applications through targeted application validation with a fraud check on 90% applications referred to the CAFT at offer stage (KPI2) * 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 | **Objective partially achieved**  **Tenancy recoveries work stream**  Working in partnership with Housing Resident Services and Harrow’s Registered Social Landlords (RSLs), 6 social housing tenancies were recovered resulting in notional fraud savings of £558,000.  **KPI1 target 10, achieved 6 (60%)**  **Savings subtotal achieved £558,000**  **Housing applications work stream**  Housing Applications proactive exercise was commenced in Q4 (desk based intelligence) but the visiting schedule was not possible to due to Covid-19. Consideration will be made in the 2020-21 plan to complete this work.  A total of 13 housing application referrals have been received by the team during the year and 2 positive outcomes have been achieved where applications were rejected on the basis that the applicant had provided false or misleading information.  **Savings sub total achieved £99,000**  **RTB work stream**  Working in partnerships with Leasehold Services, HB Public Law Services and Housing Management, 6 RTB applications were intercepted saving the authority £658,000 in terms of purchase discount losses prevented.  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%**  **Savings subtotal achieved £658,000**  **PoSHFA 2013 Powers work stream**  The authority has utilised powers contained within the above act through requests to the National Anti Fraud Network (NAFN) regularly during the 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 £1,315.000** |

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|  | **Fraud work stream** | **2019-20 Year end outcome** |
| 13 | **Internal fraud & corruption**  Risk assess 80% allegations of internal fraud and corruption as a priority and deploy resources on those cases where there is corroborative evidence within an average of 5 workings days of receipt of the information (KPI3). | **Objective achieved**    Of the 8 internal fraud referrals received all 8 were risk assessed and resources allocated in 5 working days.  **KPI3 target 80%, achieved 100%.**    There have been 2 positive outcomes during the year.  An employee was arrested in April 2018 and dismissed in June 2018 following misuse of a company purchase card resulting in salary savings of £19,890. This was reported previously to the Committee. On 16th July 2019, they were convicted at Willesden Magistrates Court of fraud amounting to £494.42 and sentenced to 200 hours of unpaid work to be complete within 12 months and a compensation order to repay the full loss amount to the authority.  In the second case, a former employee already dismissed and successfully prosecuted for fraud was the subject of a successful Proceeds of Crime Act (POCA) order where the court made an order that the value of the authority pension was to be paid across to the authority to pay towards the debt. The pension value was £75,102.10  **Overall fraud savings attributed to this work stream is £75,596.52 plus £80 costs** |
| 14 | **Revenues/Business Rates/Council Tax Support fraud**  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 exemptions, discounts and reliefs, apply appropriate sanctions where fraud is proven and assist in the recovery of fraud related losses | **Objective achieved**  The team processed 9 referrals of Council Tax discount/exemption fraud, CTRS fraud and NNDR fraud. There have been 14 positive outcomes during the year primarily 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 overpayments £21,871.67  HB overpayments £126,782.97  **Overall fraud savings attributed to this work stream is £148,654.64** |
| 15 | **Social care fraud**  Work in partnership with the People Directorate to investigate allegation of fraud and abuse of the social care system including but not limited to:-   * Personal budget applications, assessment and monitoring of spend * A proactive fraud risk based exercise in relation to those individuals being financially supported in long term residential care | **Objective achieved**  There have been 6 positive outcomes involving social care cases; 2 involving residential care, 3 involving personal budget cases and 1 case involving a No Recourse to Public Funds (NRPF) case.  A personal budget investigation uncovered false documentation that an individual had submitted to continue to receive care for their son, but the reality was that the care was not taking place. The investigation is now complete and a reassessment of the applicant has resulted in the individual being invoiced for in excess of £100,000. A decision on further punitive action is pending.  In case two, the personal budget was being misused by an individual and funds spent on items outside of the agreed care plan. There is an overpayment in excess of £17,000 on this case. The final case involved an individual that failed to disclose capital for the purposes of the financial assessment which would have meant that they would not have received any financial support had it been declared. This overpayment amounts to in excess of £26,000.    The proactive fraud risk based exercise in relation to residential care financial assessments commenced in Q4 of 2018/19 continued in 2019/20 and of the 20 cases reviewed, 2 are currently live under investigation with suspicions that the applicant / representative have failed to disclose capital/assets impacting the financial assessment.  The other long term residential care case is a historical investigation where a family member deliberately deprived the applicant of capital which would have impacted the financial assessment. The overpayment of care fees in this case is in excess of £100,000. The authority obtained a charging order in January 2020 and next steps were to apply for an order of sale in order to recover the losses.  The one ‘no recourse to public funds’ (NRPF) case was investigated where the applicant had failed to disclose to the authority that their immigration status had changed so continued to receive financial support from the authority whilst claiming state benefits too. This amounted to a loss of £2626 which is being recovered.    **Overall fraud savings attributed to this work stream is £274,953.76** |
| 16 | **Partnership working**  Responding to requests for information in a timely manner from our law enforcement partners e.g Police, HMRC, Other LA’s etc | **Objective achieved**  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. |
| 17 | **Risk assess allegations of fraud and corruption**  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. (KPI4) | **Objective achieved**  Of the 205 referrals received during the year, 201 (98%) were risk assessed and resources deployed to those cases accepted for investigation within 10 working days.  **KPI4 target 80%, achieved 98%** |

**Performance of Corporate Anti-Fraud Team**

**Introduction**

A number of Key Performance Indicators (KPIs) were agreed as part of the 2019/20 Corporate Anti-Fraud Plan and performance against these is set out in the table below:

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| **No.** | **CAFT Key Performance Indicators 2019/20** | **Target** | **Mid-year** | **Year-end** | **Comments** |
| 1. | Recovery of 10 social housing units subject to fraud and misuse | 100% | 40% (4/10) | 60% (6/10) | **Not achieved**  6 social housing units were recovered during the year. The proactive exercise run in Q3 provided disappointing results which was a contributing factor to this outcome. |
| 2. | Fraud validation checks undertaken on Right to Buy applications referred to the CAFT at offer stage and before completion | 90% | 100% (14/14) | 100%  (27/27) | **Achieved**  27 Right to Buy applications received by the team during in the year, all 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% (6/6) | 100%  (8/8) | **Achieved**  Of the 8 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% | 96% (66/69) | 98%  (201/ 205) | **Achieved**  Of the 205 referrals received by the team during the year, 201 (98%) were risk assessed and resources deployed within 10 working days. |
| 5. | Fraud risk recommendations agreed for implementation | 70% | 94% (15/16) | 96%  (26/27) | **Achieved**  Of the 27 fraud risk recommendations made by the team in reports and briefing notes, 26 (98%) were agreed for implementation by management |

**Fraud referrals, outcomes and savings summary**

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| **Fraud Risk Area** | **19/20**  **Q1 & 2** | **19/20**  **Q3 & 4** |
| **Housing application fraud**  Referrals  Positive outcomes  Savings | 11  0  0 | 2  2  £99,000 (2 x applications rejected) |
| **Blue badge**  Referrals  Positive outcomes  Savings | 10  1 (successful prosecution)  £980 (£500 notional outcome, £250 court costs, £200 fine and £30 victim surcharge) | 6  0  0 |
| **Fraud other**  Referrals  Positive outcomes  Savings | 3  0  0 | 1  0  0 |
| **No Recourse to Public Funds**  Referrals  Positive outcomes  Savings | 2  1  £2626 | 1  0  0 |
| **Revenues/CT/CTRS/HB**  Referrals  Positive outcomes  Savings | 4  10  £90,290.55 (mainly linked housing fraud investigations) | 5  4  £58,364.05 (mainly linked housing fraud investigations) |
| **Internal**  Referrals  Positive outcomes  Savings | 7  1 (successful prosecution of former employee for purchase card misuse)  £579.42 | 2  1  £75,102.1 (Proceeds of crime act award against former employee) |
| **Right to Buy**  Referrals  Positive outcomes  Savings | 14  4  £439,500 (4 x RTB applications rejected) | 20  2  £218,500 (2 x RTB applications rejected) |
| **Social care/grants**  Referrals  Positive outcomes  Savings | 6  4  £248,326.12 (2 x residential care cases, 2 x personal budget cases) | 2  1  £26,627.64 (1 personal budget case) |
| **Tenancy**  Referrals  Positive outcomes  Savings | 18  4  £372,000 (4 x tenancies recovered) | 99  2  £186,000 (2 x tenancies recovered) |
| **NFI**  Positive outcomes  Savings | 379  £894,857.34 (see section 6 for detail. Mid year 19/20 running total) | 22  £45,985.59 |
| **Totals**  **Referrals**  **Positive outcomes**  **Fraud Savings** | **75**  **404 (inc NFI cases)**  **£2,049,159.43** | **138**  **34 (inc new NFI cases)**  **£709,579.38** |

**2019-20 Year End Financial Summary**

The level of fraud and corruption identified impacting the authority for 2019-20 amounts to in excess of £2.7 million which represents an approximate return on investment for the team’s running costs of just over 10:1

1. Notional cost of removing 1 case from the waiting list following a match is £3240 as per Cabinet Office guidance [↑](#footnote-ref-1)
2. Notional cost of recovering a blue badge out of circulation registered to a deceased individual is £575 as per Cabinet Office guidance [↑](#footnote-ref-2)