HARROW COUNCIL
DRAFT CORPORATE ANTI-FRAUD PLAN 2023/24

Appendix 1 - Draft Corporate Anti-Fraud Plan 2023/24

	Fraud work stream	Proposed counter fraud coverage
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. A new methodology was deployed in 2022/23 which will be reviewed at the end of the year to assess it's accuracy.
2.	Corporate Anti-Fraud & Corruption Strategy 2022-26	Complete the Corporate Anti-Fraud & Corruption Strategy 2022-26 and ensure that it is communicated internally to raise awareness of fraud
3.	Corporate Anti-Fraud & Corruption Strategy 2022-26 self-assessment	Undertake a self assessment against the Fighting Fraud & Corruption Locally Strategy 2020 checklist and draft an action plan for implementation to address any governance gaps identified
4.	National Fraud Initiative co-ordination role	Co-ordination of the 2022/23 National Fraud Initiative (NFI) match processing including:- • Process all matches which are the responsibility of the CAFT • Support service areas across the authority to ensure their matches are processed in a timely manner and that suspected fraud/error is investigated appropriately • Process fraud referrals passed to the CAFT from other teams and from outside of the authority in line with team performance indicators
5.	Fraud e-learning	Assist in the design and delivery of a fraud e-learning package using the authorities' Learning Management System (LMS365) to replace the current package.
6.	Cifas Employee Screening	Implement employee fraud screening using the Cifas Enhanced Internal Fraud Database (EIFD) for new permanent staff.

7.	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 and awareness internally and in local and national media, including the use of all forms of social media including the following actions:- • Assist Learning and Development with the continuation of mandatory fraud e-learning and the changeover to a new e-learning course in year • Fraud communication bulletins in relation to articles on fraud and corruption including real case studies • Issuing management reports detailing investigation outcomes and recommendations for improving fraud risk controls are implemented (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 • The use of Yammer to promote fraud awareness and signpost to the e-learning package
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 Cifas
9.	Challenging Organised Crime Groups (OCGs) project	Continue to explore a proof of concept to identify and investigate OCGs in partnership with the Department for Business, Energy & Industrial Strategy (BEIS), University of the West of England & Synalogik Innovative Solutions
10.	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 a combined total of 11 Council social housing units and disrupt/intercept fraudulent Right to Buy applications (KPI1)

		• Prevent housing application fraud through a partnership approach with Housing Needs providing fraud risk advice, support and the investigation of allegations of fraud
		• Prevent fraudulent Right to Buy (RTB) applications through targeted application validation with a fraud check on at least 90% applications referred to the CAFT at offer stage and before completion (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
		• Plan and implement a proactive anti-fraud data matching exercise to identify the misuse of Council social housing units
11.	Social care fraud	Work in partnership with the People Directorate to undertake a sample check of fraud and abuse of in social care system including but not limited to:- • A proactive fraud risk-based exercise of personal budgets applications, assessment and monitoring of spend and/or • A proactive fraud risk-based exercise in relation to those individuals being financially supported in long term residential care
12.	Risk assess allegations of internal fraud and corruption	Risk assess 85% of allegations of fraud and corruption and deploy resources on those cases deemed sufficiently high enough fraud risk within an average of 5 working days of receipt of the information (KPI3)
13.	Risk assess allegations of fraud and corruption	Risk assess 85% 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)

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No.	CAFT Key Performance Indicators 2023/24	Target
1.	Seek to recover a combined total of 11 Council social housing units and disrupt/intercept fraudulent Right to Buy applications	100%
2.	Fraud validation checks commenced on Right to Buy applications and resources deployed in 10 working days with 100% check before purchase completion	90%
3.	Internal fraud and corruption referrals risk assessed and resources deployed in 5 working days	85%
4.	Fraud and corruption referrals risk assessed and resources deployed in 10 working days	85%
5.	Fraud risk recommendations agreed for implementation	85%

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May 2023

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