

**HARROW COUNCIL
DRAFT CORPORATE ANTI-FRAUD PLAN 2024/25**

Appendix 1 - Draft Corporate Anti-Fraud Plan 2024/25

	Fraud work stream	Proposed counter fraud coverage
1.	Corporate fraud risk assessment	Identify and assess Harrow's fraud risk exposure affecting the principal activities in order to fully understand changing patterns in fraud and corruption threats and the potential harmful consequences to the authority and our customers.
2.	Corporate Anti-Fraud & Corruption Strategy 2022-26 self-assessment action plan implementation	Implement the action plan developed following the self-assessment undertaken in 2023-24 against the Fighting Fraud & Corruption Locally Strategy 2020 checklist to address any fraud risk governance gaps identified.
3.	National Fraud Initiative (NFI) co-ordination	Co-ordination of the 2024-25 National Fraud Initiative (NFI) data match exercise including:- <ul style="list-style-type: none"> • Ensuring the authority complies with fair processing guidelines required to submit data into the exercise in accordance with timescales so as to be compliant with the DPA 2018. • Supports service areas in extracting the data from core systems in the required specification in accordance with timescales. • Upload the data securely onto the Cabinet Office NFI portal and in accordance with timescales. • Liaise with service areas when the data matches are released back to authority in January 2025 to ensure that action is commenced promptly on those matches that are deemed to be high risk.
4.	Fraud e-learning module, HUB and Website pages	Undertake a review of the fraud e-learning package to ensure it is current and accurately reflects the areas of high fraud risk the authority faces. This includes updating case studies with more recent examples. In addition, updating the hub and website pages for the CAFT content.
5.	Credit Industry Fraud Avoidance System (Cifas) Employee Screening	Consult internally with relevant stakeholders and implement employee fraud screening using the Cifas Insider Threat Database (ITD) for new permanent staff and internal promotion.

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6.	Corporate anti-fraud awareness	<p>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:-</p> <ul style="list-style-type: none"> • Issue communications and consider fraud awareness workshops relating to the updated Corporate Anti-Fraud & Corruption Strategy 2022-26. • 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. • Design and deliver a fraud awareness campaign to run in conjunction with International Fraud Awareness week 17 – 24 November 2024.
7.	Fraud liaison	<p>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.</p>
8.	Housing fraud	<p>Assess and investigate allegations of fraud and abuse in the housing system working in partnership with Housing Resident Services, Housing Needs and Harrow's Registered Social Landlords including:</p> <ul style="list-style-type: none"> • 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 in particular verifying those applicants housed outside of the borough in temporary accommodation. • 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).

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		<ul style="list-style-type: none"> • 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. • Raise awareness of tenancy fraud within the authority and in the community by using case studies and articles of proven cases in Housing newsletter, in annual rent statements and any other housing specific campaigns. • Plan and implement a proactive anti-fraud data matching exercise to identify the misuse of Council social housing units working with Experian or other the Cabinet Office. • Explore housing regeneration fraud risks and suspected lack of occupation of housing units for those tenants temporarily decanted whilst new housing is built in the borough. • Explore the fraud risks associated with housing those individuals leaving care by fraud checking those being offered housing to ensure they meet the Council housing allocation criteria.
9.	Social care fraud	<p>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:-</p> <ul style="list-style-type: none"> • A proactive fraud risk-based exercise in relation to those individuals being financially supported in long term residential care • Explore the fraud risks associated with housing those individuals leaving care by fraud checking those being offered housing to ensure they meet the Council housing allocation criteria.
10.	Disabled parking badges	Working with the Place Directorate, provide fraud support and guidance on enforcement days across the borough around suspected blue badge misuse.
11.	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).
12.	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%

Justin Phillips
Service Manager, Corporate Anti-Fraud Team
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