London Borough of Enfield

General Purposes Committee

30 June 2021

Subject:	**Counter Fraud Service Annual Report 2020/21**

Cabinet Member:	**N/A**
Executive Director:	**Ian Davis, Chief Executive**

Key Decision:	**N/A**

Purpose of Report

1. The work the Counter Fraud team has undertaken during the year ending 31 March 2021 is presented in terms of outcomes as well as the value of frauds prevented, and overpayments raised.

2. During the year, some notable results have been achieved, including the identification of overpayments and preventative savings of £3.8m (2019/20 - £3.11m), primarily achieved through the verification of business grants applications, the cancellation of fraudulent claims by tenants to purchase properties under the Right to Buy scheme, the raising of overpayments relating to Housing Benefit and Council Tax, and the screening of applications for support from persons with No Recourse to Public Funds.

3. An additional £6m in notional housing savings been identified as a result of the work undertaken jointly with the Neighbourhood and Temporary Accommodation Procurement teams to recover properties that were not being lawfully occupied by the respective tenants. These savings, which represent the rebuild costs of the recovered properties, bring the total savings to £9.9m for the year (£12.5m for 2019/20).

Proposal

4. The General Purposes Committee is requested to:

- endorse the work of the Counter Fraud team;
- provide feedback on the contents of this report.

Reason for Proposal

5. Recognition and support for the work of the Counter Fraud team demonstrates the Council's commitment to a zero-tolerance approach to fraud, as outlined in the Council's Counter Fraud Strategy, and serves as a deterrent to fraudsters targeting the Council.

Relevance to the Council's Plan

Good Homes in Well-Connected Neighbourhoods

6. An effective Counter Fraud function, supported by robust policies and procedures, helps minimise losses due to fraud that might adversely affect the delivery of good homes in well- connected neighbourhoods.

Safe, Healthy and Confident Communities

7. An effective Counter Fraud function, supported by sound policies and procedures, helps minimise losses due to fraud that might adversely affect the Council achieve its objectives to sustain safe, healthy and confident communities.

An Economy that Works for Everyone

8. An effective Counter Fraud Service will minimise losses due to fraud and help the Council achieve its objectives in building a local economy that works for everyone.

Background

9. This report summarises the work of the Counter Fraud team for the period 1 April 2020 to 31 March 2021.

10. Although some aspects of our work were adversely impacted by Covid-19 and some members of staff were seconded to support pandemic work in other areas, the team still achieved some notable results during this period, including:

- Business Grants savings totalling £2.1m

- Supporting the Housing and Regeneration and Temporary Accommodation Procurement teams in recovering 58 properties;

- Identifying overpayments and potential savings exceeding £1.7m. This included the identification of fraudulent or unlawful claims for Right to Buy discounts, claims for support provided by the No Recourse to Public Funds team, Council Tax (support, discounts, and exemptions), and Housing Benefits;

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- 6 financial penalties totalling £6k were levied for Council Tax Support offences.

These results are summarised in **Table 1** and **Table 2** at **Appendix A**.

Business Grants

11. Throughout 2020/21, the Counter Fraud team have supported the Business Rates and Economic Development teams with the verification of grant applications submitted by small businesses and those operating in the retail, hospitality or leisure sectors (RHL).

12. In addition to the original Small Business Grant scheme, various additional schemes were developed by the Department for Business, Energy and Industrial Strategy (BEIS) as the year progressed. These included Second and Third National Lockdown Grants, Local Authority Discretionary Fund payments, Local Restrictions Support Grant, Additional Restrictions Grants, and Restart Grants.

13. The Counter Fraud team played a key role in designing the application process in order to minimise opportunity for fraud. The team also developed risk assessments and undertook pre- and post-payment assurance checks in accordance with the requirements stipulated by BEIS.

14. This work has enabled us to identify preventative savings and overpayments to the value of £2.1m. Preventative savings were £1.4m and grants recovered or invoiced for recovery totalled £661k.

15. Preventative savings are typically cases where we identified companies that were registered for payment of business rates, but were no longer trading and were therefore ineligible for a grant payment.

16. Further details of these savings are summarised in **Table 3** and **Table 4** at **Appendix A**.

Housing Fraud

17. For 2020/21, the Counter Fraud team received funding from the Housing Revenue Account (HRA) to provide investigative support to the Neighbourhood Team in Housing and Regeneration. These investigations focused on recovering properties that had been unlawfully used, including those that had been abandoned or sublet. Once recovered, these properties were than available for re-let to applicants in genuine need of assistance.

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18. This work was negatively impacted by the effects of Covid-19; primarily the suspension of evictions, Court hearing delays, and the extensions to notice periods. However, in 2020/21 this joint project resulted in recovery of 40 properties (2019/20: 62).

19. In addition, the Counter Fraud team supported the work of temporary accommodation visiting officers who conducted a rolling programme of targeted visits (when lockdown restrictions allowed). 18 abandoned or misused properties were identified in 2020/21 (2019/20: 38).

20. The HRA has also funded investigation support to the Right to Buy (RTB) Team. This process examined every qualifying RTB application. During 2020/21 a total of 8 cases were cancelled or withdrawn following the intervention of the Counter Fraud team (2019/20: 17). Had these applications been allowed to proceed, the cumulative discounts allowed against the purchase price would have been approximately £870k.

21. Throughout 2020/21, a dedicated Counter Fraud investigator supported the No Recourse to Public Funds (NRPF) team in the Homelessness Service. Due to the investigator's interventions, a total of 15 applications were refused or cancelled during 2020/21 (2019/20: 16), generating estimated savings of £268k (based on average annual support costs of £17,887 calculated by the NRPF Network). The NRPF team were also able to reduce the level of financial assistance provided to a further 7 households (2019/20: 12) where the investigator identified previously undeclared household income. Had these claims continued unchecked until the end of the year, a further £11k in support payments would have been paid out (2019/20: £17k).

Other significant cases

22. During 2020/21, the team assisted Exchequer Services and the Police with regard to the successful prosecution of a former member of staff who stole £20k in cash from the Council. The individual concerned received a suspended sentence and was ordered to observe a three month curfew.

23. Another case led to the resignation of a school employee after an investigation established that they had set up a company that became an established supplier to the school, although at no point did the employee declare their involvement with this company to the school.

Fraud Prevention work

24. To mark International Fraud Awareness Week 2020, the Counter Fraud team ran five Microsoft Teams sessions between 16th and 20th November 2020 under the theme "Fraud Matters". The sessions were designed to raise fraud awareness amongst staff and highlight the work undertaken by the team.

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25. These sessions covered the following areas:

- Housing investigations
- Corporate fraud
- Welfare and benefit investigations
- Cyber fraud (presented jointly with the Digital Services Security Manager)
- Motor insurance fraud (with the Insurance Manager)

26. Over 200 people attended over the 5 days and we received some very positive feedback. The presentations were supported by a video warning of heightened fraud risk during the Covid-19 pandemic and an online quiz entitled "How Well Do You Know Fraud?".

27. To support fraud prevention work in schools, a working group was established to develop a fraud risk register for schools' staff. Counter Fraud staff also developed a PowerPoint presentation to raise awareness of schools' fraud. Both documents are available via the Schools' HUB.

Financial Investigations

28. The team's Financial Investigator continued to support both Trading Standards and Planning in the areas of Proceeds of Crime confiscation, enforcement and re-considerations.

29. One of the cases concluded during 2020/21 involved a "cowboy builder" who had previously pleaded guilty to a number of criminal offences connected with the provision of sub-standard building works. The individual concerned had transferred his half share of a property into his wife's name. Through the Courts we were able to argue successfully that this constituted a 'tainted gift' under the Proceeds of Crime legislation. Subsequently a Confiscation Order was made at Wood Green Crown Court that the defendant pay back £68,090 or face an additional year in prison. The judge also ordered that all of the money be used to compensate the victims.

2020/21 Caseload analysis

30. Overall the team reviewed 754 cases in 2020/21; a total of 298 irregularities were identified, with the remaining 456 cases successfully validated. Full details are shown in **Charts 1** and **2** at **Appendix A**.

Whistleblowing cases

31. A refreshed Whistleblowing Policy, including a model Schools Whistleblowing Policy, was presented to the General Purposes Committee

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in March 2021. During 2020/21, the Audit and Risk Management Service was advised of 6 cases raised under the Whistleblowing Policy (2019/20: 4). A summary of these can be found at **Table 5** in **Appendix A**.

Insurance Fraud

32. All insurance claims are subject to close scrutiny prior to payment and consequently no claims were deemed to be fraudulent during 2020/21.

Blue Badge Misuse

33. The Environmental Protection Team in the Place Department are responsible for investigating the misuse of Blue Badges. The restrictions imposed as a result of the pandemic meant that street patrols ceased in March 2020 and are yet to resume. In 2020/21, the team successfully prosecuted 4 individuals (2019/20: 34). The Courts have recently resumed hearings for Blue Badge cases and 22 cases are awaiting a hearing date.

Transparency Data

34. The Local Government Transparency Code requires us to publish data with regard to specific fraud-related activities. This data is presented in **Table 6** at **Appendix A.**

Counter Fraud Operating Plan 2020/21

35. Our annual Operating Plan provides an overview of the work that the team will cover during the year. Progress made against the 2020/21 plan is detailed at **Appendix B**.

36. The Operating Plan for 2021/22 is being presented to the General Purposes Committee separately as part of the 2021/22 Counter Fraud Strategy.

Main Considerations for the Council

37. Any large complex organisation needs to have a well-established and effective Counter Fraud function in place to minimise losses due to fraud; these policies help underpin that function.

Safeguarding Implications

38. There are no safeguarding implications arising directly from this update from the Audit and Risk Management Service.

Public Health Implications

39. There are no Public Health implications arising from this report.

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Equalities Impact of the Proposal

40. Following the Completion of the Corporate Equalities Impact Assessment initial screening, this report does not have an Equalities impact.

Environmental and Climate Change Considerations

41. There are no discernible environmental and climate change considerations arising from the proposals in this report.

Risks that may arise if the proposed decision and related work is not taken

42. If the work of the Counter Fraud function is not supported, then there is a risk that the Council may suffer financial and reputational loss from fraudulent activities.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

43. A risk of financial and reputational loss from fraudulent activities will still exist. However, the recognition and communication of our Counter Fraud activities will mitigate that risk.

Financial Implications

44. The recognition and communication of the work of the Counter Fraud team will aid in mitigating financial risk to the council, however there are no specific financial implications related to this report.

Legal Implications

45. There are no specific legal implications arising from this report.

Workforce Implications

46. There are no specific workforce implications arising from this report.

Property Implications

47. There are no property implications intrinsic to the proposals in this report.

Other Implications

48. N/A

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Options Considered

49. In line with recognised best practice, no other options were considered.

Conclusions

50. The General Purposes Committee is requested to:

- note the work completed by the Counter Fraud Team during the period 1 April 2020 to 31 March 2021 and the key themes and outcomes arising from this work

- provide feedback on the contents of this report

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Date of report: 21 June 2021

Appendices

Appendix A: 2020/21 Outcomes
Appendix B: Operating Plan 2020/21

Background Papers

None

Outcomes from Counter Fraud Activities 2020/21

Table 1: Housing Recoveries

Fraud Type	Annual Target	Actual	Variance
Council Properties Recovered	75	40	(35)
TA / PSL / HA Properties Recovered	25	18	(7)
Overall *	**100**	**58**	**(42)**

Total Savings from Frauds Investigated or Prevented **	**£2.75m**	**£3.8m**	**+ £1.05m**

* Includes recoveries identified by the Neighbourhood and Temporary Accommodation Procurement teams, supported by Counter Fraud Officers

** Includes overpayments identified or recovered, as well as potential future income and the estimated value of losses prevented by the detection and interception of fraud and improvement of controls – please see Table 2 below.

Table 2: Counter Fraud Savings Analysis

	Fraud Detection		Fraud Prevention		
	Saved for LBE (£)	Saved for gov.uk (£)	Saved for LBE (£)	Saved for gov.uk (£)	Total (£)
Housing Benefit (DWP)	-	496,421	-	-	496,421
Council Tax: Reduction Scheme	52,824	-	-	-	52,824
Benefit Penalties	5,683	-	-	-	5,683
CT Single Person Discount	1,425				1,425
Business Rates (value of new invoices raised)	33,410				33,410
NRPF: 15 cases @ £17.9k per case cancelled ***	-	-	268,000	-	268,000

| | Fraud Detection | | Fraud Prevention | | Total |
	Saved for LBE (£)	Saved for gov.uk (£)	Saved for LBE (£)	Saved for gov.uk (£)	(£)
NRPF: value of support reduced	-	-	11,347	-	11,347
RTB: value of discounts refused (8 in total)	-	-	869,500	-	869,500
	93,342	**496,421**	**1,148,847**		**1,738,610**
Council properties recovered: 40 (rebuild value of £150k per property) ****	-	-	6,000,000	-	6,000,000
TA / PSL / HA properties recovered: 18 (annual average cost of £2.5k per property) ****	-	-	45,000	-	45,000
TOTAL	**93,342**	**496,421**	**7,193,847**	**-**	**7,783,610**
GRAND TOTAL INCLUDING BUSINESS GRANTS (Tables 3 & 4)	**93,342**	**1,157,421**	**7,193,847**	**1,418,000**	**9,862,610**

*** *Source: NRPF Network*
**** *Included with effect from January 2019, The Chartered Institute of Housing estimate the average cost of building a new home to be £150k. The Notional Value of a Temporary Accommodation recovery is based on the net annual cost to the Council of acquiring a property for use as temporary accommodation.*

Table 3 – Business Grants Withheld

Referral Category *	Small Business Grants (No.)	RHL Grants (No.)	Discretionary Grants (No.)	National Lockdown Grants (No.)	Value (£k)
Spotlight	9	5	-	-	215
CIFAS	4	1	-	-	65
Companies House	50	2	-	-	550
Pro-active checks	13	5	19	46	468
NNDR Team	6	3	-	-	120
Total	**82**	**16**	**19**	**46**	**£1,418k**

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Table 4 – Grants Recovered (or invoiced for recovery)

Referral Category *	Small Business Grants (No.)	RHL Grants (No.)	Value (£k)
NNDR Team	15	6	270
Pro-active checks	23	8	391
Total	**38**	**14**	**£661k**

The referral sources used for this work are:

Spotlight matches

This is a system that has been made available for Local Authorities to help verify grant applications; it essentially automates due diligence checks by matching our data with Companies House records of businesses that have been dissolved or are in liquidation.

CIFAS (Credit Industry Fraud Avoidance Scheme) matches

We bulk-matched our data against CIFAS records to check for individuals who have previously been refused a bank loan or insurance claim for fraud-related reasons, and these grant applications were subjected to increased scrutiny.

Other pro-active checks

This includes open-source internet searches to identify business premises that may be empty; additional checks with Companies House; and referrals from the Business Rates Team.

NNDR Team

These are referrals where the Business Rates Team have identified concerns.

Table 5: Whistleblowing Cases 2020/21

Concern	Outcome
Employee timekeeping	Not substantiated
Inappropriate relationship between manager and employee	Not substantiated
Mistreatment of two former employees	Not substantiated
Employee working remotely abroad without permission	Not substantiated

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Concern	Outcome
Health and Safety concerns (Covid-related)	Concerns were addressed with relevant staff
Undeclared secondary employment / conflict of interests	Substantiated; it was agreed that the secondary employment would be relinquished. Additionally, the process for staff to declare secondary employment has since been reviewed and revised.

Table 6 – Transparency Code Data 2020/21

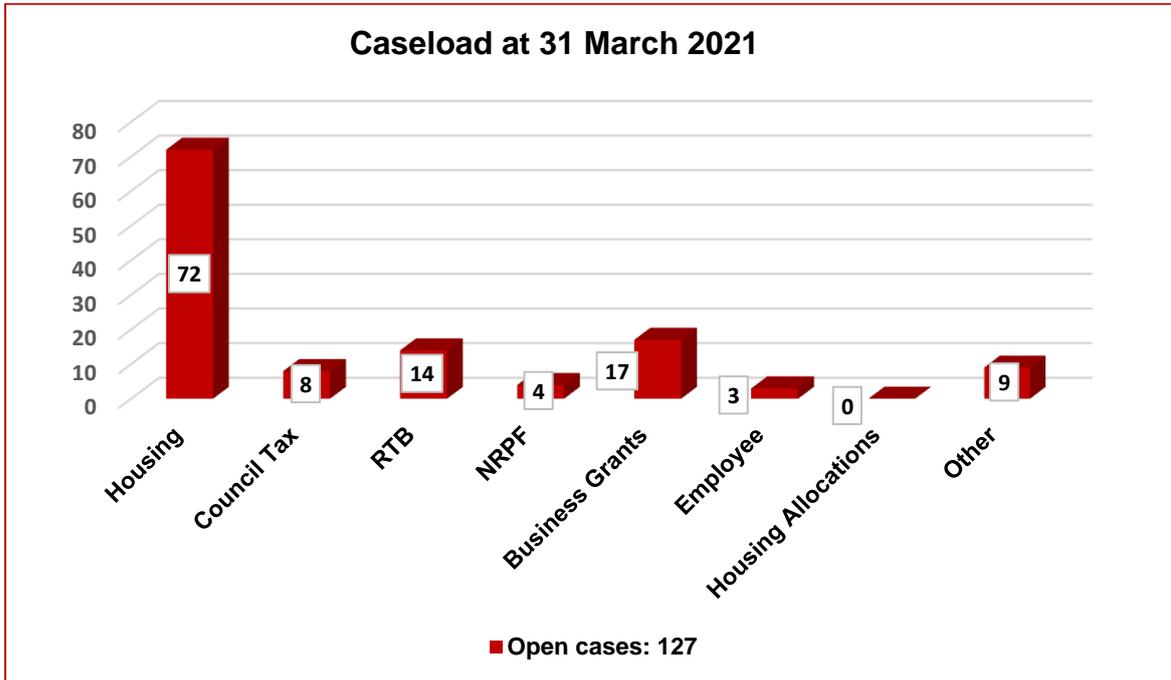| Category	Value
Number of occasions that powers under the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014, or similar powers have been used	1
Total number (absolute and full time equivalent) of employees undertaking investigations and prosecutions of fraud ·	9 absolute, 8.8 FTE
Total number (absolute and full time equivalent) of professionally accredited counter fraud specialists	9 absolute, 8.8 FTE
Total amount spent by the authority on the investigation and prosecution of fraud	£460k
Total number of fraud cases investigated	754

Chart 1: Counter Fraud Caseload at 31 March 2021

Caseload at 31 March 2021

Open cases: 127

Chart 2: Counter Fraud Closed Cases

Closed Cases: 1 April 2020 to 31 March 2021

Irregularities Found (298)   Successfully Validated (456)
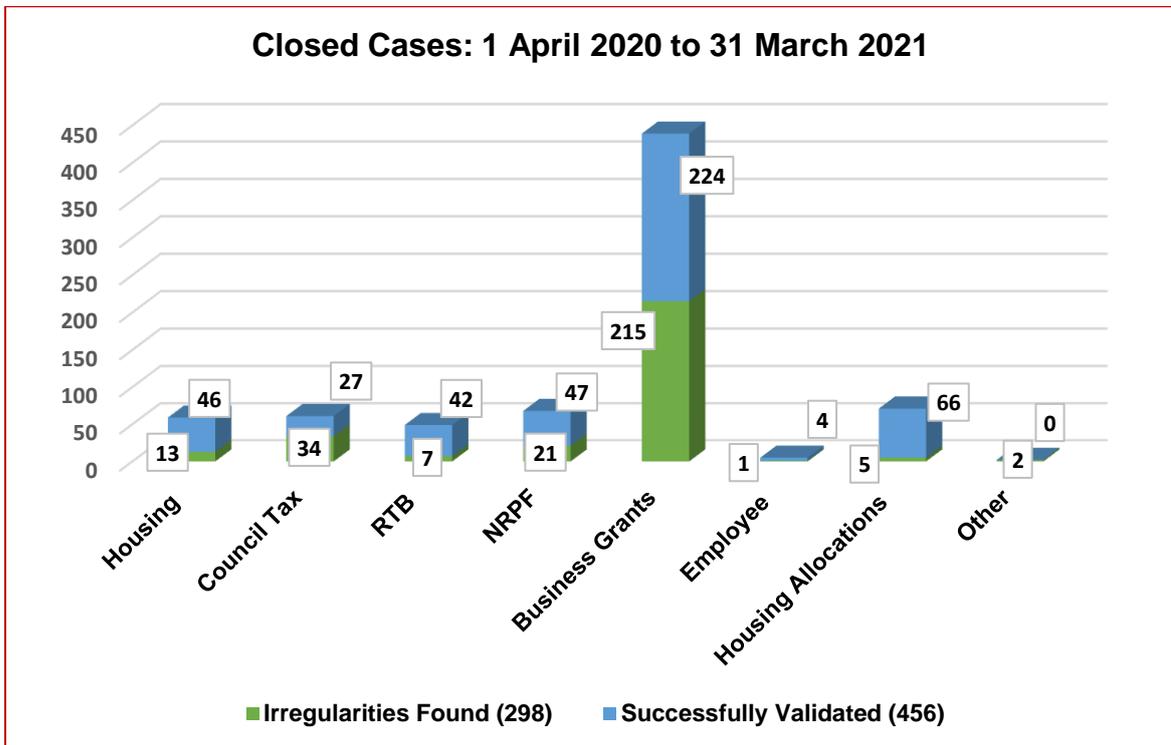
An irregularity is defined as follows:

Area	Definition
Housing	Property recovered

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Council Tax	Overpayment raised, or financial penalty imposed
Right to Buy	Application cancelled
NRPF	Application cancelled or level of support reduced
Direct Payments	Overpayment raised
Employee	Disciplinary action resulted
Housing Allocations	Removed from the list or reduced property size needs

Counter Fraud Operating Plan 2020/21

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGESS UPDATE
GOVERN • Executive support ensures Fraud, bribery and corruption measures are embedded within the organisation	Counter Fraud Culture - understanding and support from governing officers	Provide copy of Fighting Fraud & Corruption Locally (FFCL) 2020 to EMT and General Purposes Committee (formerly the Audit & Risk Management Committee)	x	x			**Completed** Presented to Committee in July 2020
		Present Counter Fraud Strategy 2020-21 to EMT and GPC	x	x			**Completed** Presented to Committee in July 2020
		Report to Assurance Board, EMT and GPC on performance (including Whistleblowing, Insurance and Blue Badge statistics)	x	x	x	x	**Completed** Reports are made on quarterly basis.
		Contribute to and participate in AMRC/GPC awayday			x		**Completed** Face-to-face session postponed due to COVID-19

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FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGESS UPDATE
							restrictions, training session held with GPC on 15/10/20 via TEAMS.

FFCL 2020	PROJECT	TASKS	Q1	Q2	Q3	Q4	PROGRESS

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PILLAR & KEY CONCEPTS	DESCRIPTION						UPDATE
ACKNOWLEDGE • Fraud risks are acknowledged and understood	Counter Fraud Strategy	Align Counter Fraud Strategy for 2020-21 with the Fighting Fraud and Corruption Locally strategy 2020.	x					**Completed**
• Key fraud areas and vulnerabilities are risk assessed Appropriate resources are agreed.	Counter Fraud Operating Plan	Review Operating Plan in line with: • Counter Fraud Strategy 2020-21 • Regular risk assessments • Internal Audit key findings	x	x	x	x		**Completed** 2021/22 Operating Plan being presented to GPC June 2021.
	Corporate Fraud, Bribery & Corruption and Money Laundering Risk Register	Draft Corporate Fraud, Bribery & Corruption and Money Laundering Risk Register for dissemination to Heads of Service for input, via Risk Management Group, with assistance from Senior Risk Officer.			x			**Ongoing** To be progressed during 2021/22.
		Present draft Corporate Fraud, Bribery & Corruption and Money Laundering Risk Register to EMT and GPC					x	**Ongoing** To be progressed during 2021/22.

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		Publicise approved document					
		Participate in Risk Management Group meetings to assist compilation and communication of key fraud and corruption risks, together with key personnel.	x	x	x	x	**Completed** The Counter Fraud Team are represented on the Risk Management Group.
		Review Risk Registers (Pentana) to inform the Counter Fraud Plan of new and emerging fraud risks and to highlight areas for proactive review.				x	**Completed** Risk Registers have been completed.
		A programme of key risk areas within the Council will be drawn up to assist with targeting fraud awareness.		x			**Ongoing** Linked to departmental risk registers as above.
	Schools Fraud, Bribery & Corruption and Money Laundering Risk Register	Set up schools working group to draft a Fraud Bribery & Corruption and Money Laundering Risk Register for Schools.			x		**Completed** The register is available via the Schools Hub.
		Present draft Schools Fraud, Bribery & Corruption and Money				x	**Ongoing** To be progressed

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			Q1	Q2	Q3	Q4	
		Laundering Risk Register to Assurance Board for approval. Publicise on Schools Hub once approved.					during 2021/22.
	Policies and procedures	Review and update current policies and procedures including: • Corporate Whistleblowing Policy • Anti-Money Laundering Policy & Guidance • Sanctions Policy • Investigation procedures • Housing fraud referral process • Assist with the update of the Schools Whistleblowing Policy					**Completed** Refreshed policies were approved by GPC in March 2021, Procedures Manual has been drafted.

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE

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FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
ACKNOWLEDGE	Collaboration with Internal Audit Team and Risk Management Team	Review Terms of Reference (TOR) for all planned audits within 2020-21 plan.	x	x	x	x	**Completed** We continue to receive TORs from the audit team.
		Examine all Audit reports for possible fraud risks/ proactive exercises for updating Counter Fraud Plan.	x	x	x	x	**Completed** Undertaken by Deputy Head of Audit & Risk.
		Proactive referrals to Internal Audit Team.	x	x	x	x	**Completed**
		Rotation of Counter Fraud staff to attend Internal Audit Team meetings.	x	x	x	x	**Completed**
		Ensuring fraud risk is covered in review of Cabinet and Committee papers.		x			
	Continuation of embedded services	Provide Counter Fraud support to: • Right to Buy (RTB) Team • No Recourse to Public Funds (NRPF) Team • Neighbourhood Teams	x	x	x	x	**Completed** To continue throughout 2021/22
	Housing Allocations &	Complete six-month project as per TOR.		x	x		**Ongoing** Remains

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
	Assessments project	Assist Service to embed fraud prevention within processes where required.					suspended due to COVID-19 restrictions.
	External data matching	Provide resources to target key matches identified by: • NFI • CIFAS			x	x x	**Completed** NFI matches have been received, discussion with CIFAs ongoing.
	Post COVID-19 assurance checks	Assist with post COVID-19 Cabinet Office assurance checks for Small Business Grants. High risk services to be identified through the Heads of Service control checks exercise.		x x	x x	x x	**Completed** This work will continue through 2021/22.
	Proactive exercises – existing data (rolling programme)	Investigators to lead on proactive exercises. Areas for consideration include: • Council Tax to Electoral Roll data match. • Procurement - Purchase Card	x	x	x	x	**Completed** Areas of pro-active work will be reviewed as part of 2021/22 Operating Plan.

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
		transactions (as per audit) • Procurement – (Neptune/ SAP) use of data analytics and CIPFA toolkit • Verification of Human Resources checks (including voluntary workers/ apprentices). • Payroll – follow up on issues identified in the 2019-20 audit		x	x	x x	
	Internal data matching (rolling programme)	Research the viability of internal data matching. Areas to consider, include: • Care home residents (non-contribution of fees to Council Tax closed accounts) • Direct Payments recipients (to Housing Benefit Landlord records) Benefit recipients (to Housing and Temporary Accommodation records)			x	x x	**Ongoing** Areas of pro-active work will be reviewed as part of 2021/22 Operating Plan.

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
PREVENT • Information and Technology is better utilised • Fraud controls and processes are enhanced to aid prevention • A more effective anti-fraud culture is developed	Fraud Awareness e-learning (Corporate)	Review iLearn module to ensure content: • is up to date (including contact details) • sufficiently covers the topics of anti-bribery & corruption and money laundering. Work with HR to maximise fraud awareness coverage for all new starters. Publicise the iLearn module on intranet/other means to increase uptake of all staff.	x	x x x	x	x	**Ongoing** Work to be continued during 2021/22.
	Fraud Awareness e-learning (Schools)	Draft Fraud Awareness module to cover school's key fraud risks. Set up a working group (including		x			**Completed** Fraud Risk Register has been completed

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		nominated Schools staff and Council Education Team) to ensure module meets Schools' needs.			x		and is available via Schools Hub.
		Upload and publicise this module on the Schools Hub, once approved by the Assurance Board to enable access to all schools' staff.				x	
	Fraud Awareness sessions (face to face)	Identify key areas within the Council for targeted Fraud Awareness sessions.	x	x	x	x	**Completed** Sessions delivered via Teams as part of International Fraud Awareness Week. This work will continue during 2021/22.
		Provide Fraud Awareness to those areas with a high fraud risk.	x	x	x	x	
	International Fraud Awareness Week	Counter Fraud Team to participate in activities during International Fraud Awareness Week 2020 (15th to 21st November) to increase awareness of fraud for staff.			x		**Completed**

FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
PURSUE • Punish fraudsters • Recover losses • Use civil sanctions • Develop capability and capacity to investigate • Develop collaborative and supportive law enforcement response	Reactive investigations	Counter Fraud Team to risk assess all referrals and investigate, where relevant, to a standard for prosecution. Reactive work will take priority over proactive work.	x	x	x	x	**Completed** This work will continue throughout 2021/22.
	Training	Training needs of Counter Fraud staff to be reviewed and refresher training to be provided where necessary.	x	x	x	x	**Ongoing** Training needs will continue to be identified via the PDR process.
	Prosecutions	Agree a standardised way of working with Legal Services to actively pursue prosecutions. Publicise successful cases.	x x	x x	x x	x x	**Ongoing** Discussions with Legal Services will continue during 2021/22 with regard to prosecution work.

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	Sanctions	Actively pursue sanctions.	x	x	x	x	**Ongoing** Sanction and Prosecution Policy approved by GPC in March 2021.
	External relationships	Review communication channels with other law enforcement agencies and neighbouring boroughs.				x	**Completed** We will continue to work closely with our shared service partner, Waltham Forest Council, and other external agencies.

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FFCL 2020 PILLAR & KEY CONCEPTS	PROJECT DESCRIPTION	TASKS	Q1	Q2	Q3	Q4	PROGRESS UPDATE
PROTECT • Protect against serious organised crime • Protect individuals from becoming victims • Protect against harm fraud can do to community • Protect public funds • Protect against fraud and cyber crime	Communication	Explore increasing the use of media to improve awareness of key fraud risks and topical issues for Council staff.			x		**Completed** We are actively using social media to highlight fraud risks during Covid
		Research means available for updating residents with periodic fraud alerts.			x		**Ongoing** Communications Strategy to be established during 2021/22.
		Use Schools' Hub to update schools of topical fraud issues.				x	**Completed** We will continue to use the hub to publicise fraud issues to schools.
	Collaboration	Explore ways to develop an improved working relationship with IT Team to: • provide joined up fraud awareness about and protection against cyber			x		**Completed** Counter Fraud Team to be represented on

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					x	x	Digital Services' Security Working group.
		• to assist with planned internal data matching.					
		• Agree improved communication with the Community Safety Team for a better understanding of fraud threats the Council and its residents face.			x		**Ongoing** To be progressed during 2021/22.

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