

Appendix 1

London Borough of Croydon Pro-active Anti-Fraud Plan 2017/18

March 2017

Introduction

This document sets out the Council's Pro-Active Anti-Fraud plan.

We know that fraud will be attempted against the Council during the coming year and as a result we will maintain a team dedicated to preventing fraudulent attempts becoming successful, investigating allegations of fraud, seeking to punish those who have committed fraudulent acts against the Council, identifying losses to be recovered and, where appropriate, taking recovery action in accordance with the Proceeds of Crime Act through financial investigations.

The Council's Anti-Fraud Policy outlines a five strand approach to countering fraud under the following headings:

- acknowledge the responsibility of the governing body for countering fraud and corruption
- identify the fraud and corruption risks
- develop an appropriate counter fraud and corruption strategy
- provide resources to implement the strategy
- take action in response to fraud and corruption

The activities and target outcomes described in the pro-active plan below link to an overall aims of the anti-fraud policy, acknowledging, identifying, developing strategy, providing resources and responding to fraud risks. The emphasis this year will focus on the greater use of data matching and data analytics

Activity	Detail	Target Outcomes
<p>National Fraud Initiative (NFI) 2017/18</p>	<p>This is the first time that the Cabinet Office has taken on responsibility for NFI, a function of the former Audit Commission. The scope of NFI is wide, encompassing local authority data on a national level, as well as that of the NHS, Home Office and for the first time some Registered social landlords. Participation in NFI is mandatory for local authorities.</p> <p>The NFI records matched data in reports and classifies each report according to fraud risk. The team will initially prioritise the reports with the highest fraud risk and then then further prioritise according to local service pressures, such as social housing.</p>	<p>The team will be seeking to review all priority matches within the first 6 months (February to August 2017).</p> <p>The team will seek to maximise the number of frauds that can be closed off and to recover funds where possible.</p> <p>The NFI will be used to identify emerging fraud risks in service areas and then inform the internal audit programme.</p> <p>The General Purposes and Audit Committee will receive reports on the outcome of cases, including the number and value of cases that have been looked at.</p>
<p>London Counter Fraud Hub (LCFH)</p>	<p>This project seeks to develop a Hub within London where data matching and other analytics can identify fraud committed against all London Boroughs.</p> <p>The Hub will be run by CIPFA, in partnership with BAE systems and promises to identify fraud on a payment by results basis using the most advanced analytics available. Croydon has been a part of the stakeholder board during the design process and has now been chosen as one of 5 pilot authorities' for the proof of concept stage.</p>	<p>Payment by results basis</p> <p>A further means of identifying fraud. This will enable investigation and where appropriate, sanction and recovery.</p> <p>As a proof of concept authority, Croydon has the opportunity to help shape the hub going forward to maximise the benefits for its own residents as well as those of other London boroughs.</p>

Activity	Detail	Target Outcomes
Continue to produce the Fraud Defence newsletter and send it Council wide and to various stakeholders.	Since 2007 the Corporate Anti-Fraud Team has delivered a quarterly newsletter called Fraud Defence to managers within the Council for dissemination to their teams. We will continue to write and deliver this Newsletter during 2017/18.	Maintain and enhance the Counter Fraud Culture of the Council; and Raise the profile of the Council's Corporate Anti-Fraud Team.
Develop e-learning opportunities for council staff through the use of the newly acquired 'Leaning Pool' platform.	The Council has recently invested in a new e-learning platform which can be used by council departments to provide learning to staff. The Corporate Anti-Fraud Team intends to develop both general and more specialist on-line courses which staff and managers can take at their own convenience.	Maintain and enhance the Counter Fraud Culture of the Council
Continue to produce press releases to highlight the successes of the Corporate Anti-Fraud Team	Following successful prosecutions or other notable successes, the team produces press releases to raise awareness of the Council's determination to investigate fraud and to deal robustly with the perpetrators. It is intended that this should act as a deterrent to some of those considering fraud against the Council.	Prevention by deterrence of some fraud that might otherwise be committed.
Croydon fraud and Enforcement Forum	The Council will continue to develop the Fraud and Enforcement Forum with key internal and external partners. Building on current successes the Council will combat fraud across the borough with our partners.	In order to monitor the successes of the Fraud and Enforcement Partnership we request feedback from its members and examples of cases that have been investigated utilising joint working capability developed through the forum

Activity	Detail	Target Outcomes
Local Authority Financial Investigators Forum	To Share good practices with other Financial Investigators who are engaged in tracing and recovering assets of people who commit Fraud against the council.	In order to monitor the successes of the Local Authority Financial Investigators Forum we will request feedback from its members and examples of cases that have been successful as a result of information received through the forum.