

# APPENDIX 1

**Stevenage Borough Council**

**Anti-Fraud Plan 2022/23**

**in partnership with**

**The Shared Anti-Fraud Service**



**SAFS**

Shared Anti-Fraud Service  
Fighting Fraud in Partnership

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## **Introduction**

This plan supports the Council's Anti-Fraud and Corruption Strategy by ensuring that the Council, working in partnership with the Shared Anti-Fraud Service (SAFS), has in place effective resources and controls to prevent and deter fraud as well as investigate those matters that do arise.

The Council's Strategy applies to all staff, elected members, agency staff, temporary staff, volunteers, consultants, contractors and partners and states that the aims of the Strategy are to;

- **Be clear that the Council will not tolerate fraudulent or corrupt acts and will take firm action against those who defraud the authority, who are corrupt or engage in financial malpractice.**
- **Provide a consistent framework for managers and Members, which enables effective deterrence, prevention, detection and investigation of fraud and corruption.**
- **Detail the responsibilities of employees, management and Members with regard to fraud and corruption.**
- **Assist the Strategic Director (CFO) in fulfilment of their role as the Council's S151 Officer and the Borough Solicitor | Lead Lawyer - Shared Legal Service in fulfilment of the role as the Council's Monitoring Officer.**
- **Explain the role of Council officers in relation to the prevention of fraud and actively promote a culture of openness and honesty in all its dealings and has adopted Codes of Conduct for Members and officers.**

This plan includes objectives and key performance indicators that support the Councils Strategy and follows the latest best practice/guidance/directives from the National Audit Office (NAO), Local Government Association (LGA) and the Chartered Institute for Public Finance and Accountancy (CIPFA).

**National Context.**

In 2013 the National Fraud Authority stated that the scale of fraud against local government “is large, but difficult to quantify with precision”. Since 2013 a number of reports have been published including by CIPFA, NAO and MHCLG stating that the threat of fraud against local government is both real, causes substantial loss (including reputational, service as well as financial) and should be prevented where possible and pursued where it occurs. The latest annual estimates of fraud risk to local government exceed £7bn.

The Fighting Fraud and Corruption Locally, A Strategy for the 2020’s, published in March 2020 is supported by CIPFA, the LGA, SOLCACE and a number of External Auditors. A copy of the Strategy can be found at <https://bit.ly/3p5Rr98>

The new Strategy compliments work undertaken in 2019 by CIPFA, NAO and Cabinet Office as well as the *Code of practice on managing the risk of fraud and corruption* CIPFA 2015 adding ‘Pillars’ of **Governance, Acknowledge, Prevent & Pursue** with an overarching **Protect**:

**Governance: Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation. Ensuring a tone from the top.**

**Protect: Against serious and organised crime, protecting individuals from becoming victims of crime and protecting against the harm that fraud can do to the community.**

**For a local authority this will also cover protecting public funds, protecting its organisation from fraud and cybercrime and also protecting itself from future frauds.**



### **Anti-Fraud Plan 2022-2023**

The Councils Anti-Fraud Plan will be over-seen by the Shared Anti-Fraud Service (SAFS) but officers at all levels across the Council will have responsibility for ensuring that the plan is delivered.

The Anti-Fraud Plan highlights specific areas of work to protect the Council against fraud and corruption. The Council also has a duty to protect the public and it does this through its work across all services in particular, by sharing information and knowledge through communications either directly or via its website. The Council has frameworks and procedures in place to prevent fraud and encourage staff and the public to report suspicions of fraud through a number of channels.

The Anti-Fraud Plan for 2022/23 follows the guidelines and checklist contained in the Fighting Fraud and Corruption Locally Strategy and progress against this will be reported to senior management and the Councils Audit and Governance Committee. A full breakdown of planned activity to protect the Council can be found at **page 7**.

### **SAFS Resources 2022-2023**

#### **Anti-Fraud Arrangements**

Stevenage Borough Council is a founding member of the Hertfordshire Shared Anti-Fraud Service (SAFS) and this service has provided the majority of the anti-fraud arrangements for the Council since April 2015. In 2019 the SAFS Partnership won the '*Outstanding Partnership*' award at the Tackling Economic Crime Awards (TECAs) and in 2020 the TECAs award for '*Outstanding Professional in Counter Fraud*' was won by a member of the SAFS team

SAFS is a Partnership with each organisation paying a fee for Hertfordshire County Council to provide a contracted service across the Partnership. SAFS, as a service, has a number of key objectives developed by its Management Board (the Board) and every Partner has a seat on the Board. For the Stevenage Borough Council the Strategic Director (CFO) is the Board representative.

Although SAFS provides much of the Councils operational counter fraud work Council officers are responsible for ensuring the policies, procedures, training and appropriate resources are in place to protect the Council from fraud, corruption and bribery.

#### **Budget**

In December 2021 the SAFS Board agreed to increase the fees for all Partners by 2.5% to meet increased service costs from April 2022. The Board also received assurance from financial modelling that the service would be sustainable, in its current form, for the next three years.

Stevenage Borough Council fees for 2022/23 are £107,707. This sum is payable quarterly.

#### **Staffing**

The full complement of SAFS in 2022/23 will be 21.6 FTE.

Stevenage Borough Council will have exclusive access to 1 FTE Counter Fraud Officer (Investigator), access to intelligence functions, data-matching services being offered through the Herts *FraudHub* (hosted by Cabinet Office) and can call on SAFS management for liaison meetings, management meetings and three Audit Committees reports per annum. An Accredited Financial Investigator is also available to assist in money laundering or proceeds of crime investigations.

The Councils Tenancy Fraud Investigator will remain seconded to SAFS for 2022/23 where their workload and line management will be provided directly by SAFS.

SAFS has access to specialist IT forensics, covert surveillance and national counter fraud intelligence services provided via third parties and criminal litigation services provided by Hertfordshire County Council Legal Service and the Shared Legal Service (SLS).

SAFS will also provide alerts (local and national) to Council officers and senior management of new and emerging fraud risks through its membership of anti-fraud forums and specialist providers including the Fighting Fraud and Corruption Locally Board (FFCLB) the Credit Industry Fraud Avoidance Service (CIFAS), Certified Institute of Public Finance and Accountancy (CIPFA) Finance, National Fraud Intelligence Bureau (NFIB), Fraud Advisory Panel and the National Anti-Fraud Network (NAFN). SAFS has officers on the various Board for CIFAS & NAFN.

### Workplans & Projects 2022-2023

As well as an agreed programme of work (see **page 7**) SAFS will work in the following areas delivering specific activity agreed with service managers. Progress with this work will be reported to the relevant head of service/managers on a quarterly basis.

Service Area	Agreed Projects
<b>Central Services / Finance</b>	<p>General Support and advice on fraud matters.            3 Reports to Finance Audit &amp; Risk Committee.            Regular meetings with officers to consider any new and emerging fraud risks and performance against SAFS KPIs            SAFS attendance at Corporate Governance/Enforcement Groups.            Assisting with the development/review of the Councils anti-fraud policies.            Money Laundering Reporting Officer (MLRO) role and Policy review, ML Risk Assessment and training for relevant staff.            5+ fraud awareness/prevention training events for staff/members in year.            Review and re-release of SAFS I-Learn training package on fraud/bribery/money laundering - hosted on the Councils Learning Pool.            Roll out of NAFN training and registration for appropriate services/officers across the Council.</p>
<b>Revenues and Benefits</b>	<p>Close liaison with the Revs and Bens services.            Proactive training and awareness for leadership and front-line staff.            Reactive investigations for HB/CTRS including working with the DWP FES, where appropriate.            Identify systems/processes/new developments to assist in recovery of debt created by fraud.            Assist with potential fraud resulting from Covid Grant Schemes administered by the Council.            Post payment assurance of grant schemes.</p>
<b>Housing Services</b>	<p>Reactive investigations for housing application &amp; tenancy related fraud.            Review all applications under the Right to Buy scheme to prevent fraud and money laundering.            Provide a focus on fraud risks affecting temporary accommodation costs.            Review housing register to identify fraudulent applications and, where appropriate, investigate these.            Continue to work with Private Registered Providers (including Clarion/Catalyst/B3L) across all aspects of tenancy fraud to assist in the recovery of properties which can be prioritised for local residents from the Councils Housing Register.</p>
<b>Data- Analytics</b>	<p>Use of data and technology to prevent or identify fraud.            Assist with NFI 2022/23 Data uploads (Oct 2022) and Output (February 2023).            FraudHub.            Further developing the effective use of the Cabinet Office FraudHub.            Support for SAFS sponsored county wide Council Tax Review Framework for SPD and EHR.            Use of data-analytics to identify fraud as result of Covid-19 and other grants schemes.            Review extension of NFI Powers to 'other' crime and debt collection.</p>
<b>Other / Contingency</b>	<p>Identify fraud risks and training in other areas including payroll, licensing, parking services, planning, procurement processes &amp; contract management.</p>

## SAFS KPIs & Standards of Service.

SAFS will work to a set of KPIs agreed with senior officers and the KPIs will assist in delivering the Anti-Fraud Plan. The KPI's can be found at **page 8** and will be reported to senior officers and the Finance Audit and Risk Committee throughout the year.

SAFS will provide the Council with the following anti-fraud services.

1. 24/7 Access to a fraud hotline, email and online solution for public reporting.
2. Process for Council staff to report suspected fraud to SAFS.
3. Training in: Fraud Awareness (management/staff/members), Fraud Prevention, Identity Fraud and Prevention.
4. Assistance in the design/review of Council policies, processes and documents to deter/prevent fraud.
5. SAFS will design shared/common anti-fraud strategies and policies or templates which can be adopted by the Council.
6. SAFS will continue to develop with the Cabinet Office and Council officers a data-matching solution (NFI- Herts *FraudHub*) to assist in the early identification and prevention of fraud.
  - The FraudHub will be funded by the Council
  - The FraudHub will be secure and accessible only by nominated SAFS and Council Staff.
  - Data will be collected and loaded in a secure manner.
  - SAFS will design and maintain a data-sharing protocol for all SAFS Partners to review and agree annually.
  - SAFS will work with Council officers to identify data-sets (and frequency) of the upload of these.
  - SAFS will work with Council officers to determine the most appropriate data-matching.
7. All SAFS Staff will be qualified, trained and/or accredited to undertake their duties lawfully.
8. All SAFS investigations will comply with legislation including DPA, UK GDPR, PACE, CPIA, HRA, RIPA, IPA\* and relevant Council policies
9. Reactive fraud investigations.
  - Any high profile, high value, high risk cases or matters reported by senior managers will receive a response within 24 hours of receipt
  - All cases reported to SAFS will be reviewed within 2 days of receipt and decision made on immediate action including selection of cases for further review, no action, investigation or referral to 3<sup>rd</sup> parties including police, DWP, Action Fraud.
  - The Council will be informed of all reported fraud affecting its services.
  - SAFS will allocate an officer to each case.
  - SAFS officers will liaise with nominated officers at the Council to access data/systems to undertake investigations.
  - SAFS officers will provide updates on cases and a summary of facts and supporting evidence on conclusion of the investigation for Council officers to review and make any decisions.
  - Where criminal offences are identified SAFS will draft a report for Council officers to make a decision on any further sanctions/prosecutions.
10. Where sanctions, penalties or prosecutions are sought SAFS will work with the Council to determine the appropriate disposal in line with the Council's policies.
11. SAFS will provide Alerts to the Council, of suspected fraud trends or reports/guidance from government and public organisations that are relevant to fraud.
12. SAFS will provide reports to senior management on the progress with delivery of this Plan and any other relevant activity planned or otherwise.
13. SAFS will provide reports through the SAFS Board and to the Council's Audit Committee as agreed in the SAFS Partnership Contract.

*\*Data Protection Act, UK General Data Protection Regulation, Police and Criminal Evidence Act, Criminal Procedures and Investigations Act, Human Rights Act, Regulation of Investigatory Powers Act, Investigatory Powers Act.*

## SBC / SAFS Action Plan 2022/2023

FFCL Pillars	Objectives	Activities	Responsible Officer
<b>Governance</b>	<p>Having robust arrangements and executive support to ensure anti fraud, bribery and corruption measures are embedded throughout the organisation.</p>	<p>The Council has in place an Anti-Fraud and Corruption Strategy &amp; Fraud Response Plan and associated policies to deter, prevent, investigate and punish acts of fraud or corruption.</p>	<p>Managing Director / Borough Solicitor / Strategic Director (CFO)</p>
		<p>The Councils Audit and Governance Committee will receive reports during the year about the arrangements in place to protect the Council against fraud and the effectiveness of these.</p>	<p>Strategic Director (CFO)/ Head of SAFS</p>
		<p>Audit and Governance Committee and its Chair, along with the senior management team, will ensure compliance with the latest best practice in the Councils anti-fraud arrangements including that published by CIPFA, NAO and LGA.</p>	<p>AC Chair/ Strategic Director (CFO)</p>
		<p>Weaknesses revealed by instances of proven fraud will be fed back to departments with recommendations to fraud-proof systems, and/or reported to senior managers or Internal Audit to review outcomes.</p>	<p>Head of SAFS/ SIAS Client Audit Manager/ Strategic Director (CFO)</p>
		<p>SAFS will assist the Council in providing its Fraud Data for the Transparency Code each year</p>	<p>Head of SAFS</p>
		<p>The Council will make it clear through its policies and codes of conduct for staff and Members that fraud and corruption will not be tolerated.</p>	<p>Strategic Director (CFO)/ Borough Solicitor/ HR Services Manager</p>
<b>ACKNOWLEDGE</b>	<p>Accessing and understanding fraud risks.</p> <p>Committing the right support and tackling fraud and corruption.</p> <p>Demonstrating that it has a robust anti-fraud response.</p> <p>Communicating the risks to those charged with Governance .</p>	<p>Review of Fraud Risks and the Councils actions to manage/mitigate/reduce this in its Annual Governance Statement. Review the Councils Money Laundering/ Bribery/ Whistleblowing/ Cyber-Crime Policies</p>	<p>Strategic Director (CFO)</p>
		<p>The Councils Communication Team will publicise anti-fraud campaigns and provide internal communications to staff on fraud awareness</p>	<p>Head of SAFS/ Communications Manager</p>
		<p>The Council and SAFS will provide fraud awareness &amp; specific anti-fraud training across all Council services and review the E-Learning training available for staff</p>	<p>HR Services Manager/ Head of SAFS</p>
		<p>The Council is a member of the Hertfordshire Shared Anti-Fraud Service (SAFS). The Strategic Director (CFO) will ensure that the services provided by SAFS are appropriate and provide an effective ROI in both savings delivered and added value.</p>	<p>Strategic Director (CFO)</p>
		<p>Audits conducted by the Shared Internal Audit Service (SIAS) will take account of known or emerging fraud risks when audit activity is being planned. SIAS will also report any suspected fraud to senior manager and SAFS to review and act upon.</p>	<p>SIAS Client Audit Manager</p>
		<p>All SAFS staff will be fully trained and accredited. SAFS will continue to work with the Cabinet Office to support the Counter-Fraud Profession.</p>	<p>Head of SAFS</p>
<b>PREVENT</b>	<p>Making the best use of information and technology.</p> <p>Enhancing fraud controls and processes.</p> <p>Developing a more effective anti-fraud culture. Communicating its' activity and successes.</p>	<p>SAFS will provide fraud alerts and new and emerging fraud threats to be disseminated to appropriate officers/staff/services.</p>	<p>Head of SAFS</p>
		<p>SAFS will work with all Council services to make best use of 3rd party providers such as NAFN, PNLD, CIPFA, CIFAS.</p>	<p>Head of SAFS</p>
		<p>Develop the Councils use of the Herts <i>FraudHub</i> and Deliver the NFI 2022/2023 Exercise</p>	<p>Head of SAFS/ Strategic Director (CFO)</p>
		<p>The Council, and SAFS, will seek to work with other organisations, including private sector, to improve access to data and data-services that will assist in the detection or prevention of fraud.</p>	<p>Head of SAFS/ Strategic Director (CFO)</p>
		<p>SAFS will provide reports to Board and SAFS Champions quarterly on anti-fraud activity at the Council</p>	<p>Head of SAFS</p>
		<p>Review data sharing agreements/protocols to ensure compliance with DEA &amp; GDPR/DEA to maximise the use of sharing data with others to help prevent/identify fraud.</p>	<p>Borough Solicitor / Data Protection Officer</p>
		<p>SAFS will work with the LGA and Cabinet Office to support the roll out of a Counter-Fraud Profession.</p>	<p>Head of SAFS</p>
<b>PURSU</b>	<p>Prioritising fraud recovery and use of civil sanctions.</p> <p>Developing capability and capacity to punish offenders.</p> <p>Collaborating across geographical and sectoral boundaries.</p> <p>Learning lessons and closing the gaps.</p>	<p>All fraud reported to the Council will be via SAFS fraud reporting tools (web/phone/email) for staff, public and elected Members.</p>	<p>Head of SAFS</p>
		<p>All investigations will comply with relevant legislation and Council Policies. Investigations will include civil, criminal and disciplinary disposals</p>	<p>Head of SAFS</p>
		<p>SAFS will use its case management system to record and report on all fraud referred, investigated and identified.</p>	<p>Head of SAFS</p>
		<p>The Shared Legal Service, HR and debt recovery teams will seek to 'prosecute' offenders, apply sanctions and recover financial losses- supported by relevant policies.</p>	<p>Head of SAFS /Borough Solicitor/ Strategic Director (CFO)</p>
		<p>SAFS and the Councils Shared R&amp;B Service will continue to work with DWP to deliver joint investigations where fraud affects both HB and CTRS</p>	<p>Head of SAFS/ Head of Revenues &amp; Benefits shared service</p>
		<p>SAFS will use its in-house expertise as well as external partners when considering the use of POCA, Surveillance or IT Forensics.</p>	<p>Head of SAFS</p>
<b>PROTECT</b>	<p>Recognising the harm that fraud can cause in the community.</p> <p>Protecting itself and its' residents from fraud.</p>	<p>SAFS will provide reports to Board and SAFS Champions quarterly on anti-fraud activity at the Council</p>	<p>Head of SAFS</p>
		<p>SAFS will review and share fraud trends and new threats</p>	<p>Head of SAFS</p>
		<p>Reports for Audit Committee on all Counter Fraud activity at the Council</p>	<p>Head of SAFS / Head of Revenues &amp; Benefits shared service</p>
		<p>The Council has in place other measure to protect itself against cyber crime, malware and other potential attacks aimed at its IT infrastructure with training for staff and members</p>	<p>Head of IT Security</p>
		<p>SAFS will work with bodies including CO/LGA/CIPFA/FFLB to develop anti-fraud strategies at a national level that support fraud prevention in local government</p>	<p>Head of SAFS</p>

**SAFS KPIs - 2022/ 2023**

<b>KPI</b>	<b>Measure</b>	<b>Target 2022/23</b>	<b>Reason for KPI</b>
1	Return on investment from SAFS Partnership.	Demonstrate, via SAFS Board, that the Council is receiving a financial return on investment from membership of SAFS and that this equates to its financial contribution.	Transparent evidence to Senior Management that the Council is receiving a service matching its contribution.
2	Provide an investigation service.	A. 1 FTE on call at the Council + Management of Tenancy Fraud Officer (Supported by SAFS Intel/ AFI/Management). B. 3 Reports to Audit Committee in year. C. SAFS Attendance at Corporate Governance, Champion meetings, team management meetings.	Ensure ongoing effectiveness and resilience of the Councils anti-fraud arrangements.
3	Action on reported fraud.	A. All urgent/ high risk cases 24 hours from receipt. B. All other cases 2 working days on Average. C. Sharing of Fraud Alerts- within 2 working days. D. Dissemination of non-SBC referrals to 3 <sup>rd</sup> parties within 2 working days (Police/HMRC/DWP/NCSC)	Ensure that all cases of reported fraud are triaged within agreed timescales.
4	Added value of SAFS membership.	A. Membership of NAFN & PNLD for Council staff. B. Membership of CIPFA Counter Fraud Centre (via HCC) C. Access to CIFAS best practice/guidance/fraud alerts (via HCC) D. NAFN Access/Training for relevant Council Staff. E. 5 Training events for staff/Members in year. F. Money Laundering Reporting Officer role. G. Support for Covid grant schemes and other local/national responses to the pandemic.	Deliver additional services that will assist in the Council in preventing fraud across all services and in the recovery of fraud losses.
5	Allegations of fraud received. & Success rates for cases investigated.	A. All reported fraud (referrals) will be logged and reported to the Council by type & source. B. All cases investigated will be recorded and the financial value, including loss/recovery/ savings of each, Reported. C. All 'sanctions' imposed in line with Council policies/ legislation. D. 100% review of all RTB applications to prevent fraud/ML	This target will measure the effectiveness of the service in promoting the reporting of fraud & measure the effectiveness in identifying cases worthy of investigation.
6	Making better use of data to prevent/identify fraud.	A. Support the NFI 2022/23 upload and output/reports across services. B. Consider other areas where the better use of data will benefit the Council financially. C. Develop and extend the use/capacity of the Herts-FraudHub for SBC.	Further develop a Hub that will allow the Council to access and share data to assist in the prevention/detection of fraud.