

AGENDA ITEM: 12 Page nos. 225 - 240

Audit Committee Meeting

Date 20 March 2007

Annual Workplan of the Corporate Anti Subject

Fraud Team 2007

Report of Acting Head of Corporate Anti Fraud Team and

Deputy Director of Corporate Governance

The Committee is asked to note the Annual **Summary**

Workplan of the Corporate Anti Fraud Team

2007-08

Officer Contributors Clair Green, Acting Head of Corporate Anti Fraud Team

Dorne Kanareck, Deputy Director of Corporate Governance

Status (public or exempt) **Public**

Wards affected N/A

Enclosures Corporate Anti Fraud Team Annual Report 2007-08

For decision by **Audit Committee**

Function of Council

Reason for urgency /

exemption from call-in (if

appropriate)

N/A

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- 1. **RECOMMENDATIONS**
- 1.1 That the Committee note the contents of the CAFT Annual Workplan for 2007-08
- 1.2. That the Committee consider whether there are any areas on which they require additional information or action.

2. RELEVANT PREVIOUS DECISIONS

- 2.1 The Corporate Anti Fraud Team (CAFT) was launched on 7 May 2004 (delegated powers report, ref: BT/2004-05 -2 March 2004)
- 2.2 On 4 April 2006, the Audit Committee included in the work programme for 2006/7, that an annual workplan of the Corporate Anti-Fraud Team be produced to this meeting.

3. CORPORATE PRIORITIES AND POLICY CONSIDERATIONS

3.1 The Corporate Plan sets out our vision and core value as a Council. One of our five core values is "value for money" - we are committed to managing the council efficiently, getting the best value for money and investing in services that matter most to our residents. The work of the CAFT supports this.

4. RISK MANAGEMENT ISSUES

4.1 The CAFT has a duty to the Council in the protection of the public purse through prevention, detection, investigation and deterrence of fraud.

5. EQUALITIES AND DIVERSITY ISSUES

- 5.1 The CAFT is committed to promoting equality, challenging discrimination and developing community cohesion. This will be demonstrated through the Annual Workplan and our service delivery.
- 5.2 Our Annual Workplan will have no adverse impact or diversity issues. The CAFT have worked closely with the Benefits service in ensuring that forms and leaflets have been modified and adapted so that all members of the community, especially vulnerable groups, have an understanding of the services provided and reduce the likelihood of intentional or other fraud being committed.

6. FINANCIAL, STAFFING, ICT AND PROPERTY IMPLICATIONS

6.1 None.

7. LEGAL ISSUES

7.1 None.

8. CONSTITUTIONAL POWERS

8.1 The Constitution, Part 3, Paragraph 2, details the functions of the Audit Committee including, "To monitor Council policies on Raising Concerns at Work" and the antifraud and anti-corruption strategy and the Council's complaints process".

9 BACKGROUND INFORMATION

- 9.1 The CAFT consists of;
 - Visiting / HBMS Team
 - Intelligence Team
 - Investigation Team
 - Support Team
- 9.2 The team continues to operate within the Counter Fraud Framework. The Framework consists of a set of comprehensive documents which details the Council's Fraud Response Plan, Fraud Reporting Toolkit, Prosecution Policy and the Whistleblowing Policy.
- 9.3 Both the authority's internal and external auditors have expressed positive feedback, particularly in relation to the introduction of the Counter Fraud Framework.
- 9.4 The CAFT work plan for 2007-08 sets out the key objectives for the year.

10. LIST OF BACKGROUND PAPERS

10.1 None.

Legal: JL CFO: CM



Corporate Anti-Fraud Team

Annual Workplan 2007-2008

1. Background Inf	ormation				
1.1 Organisational Vision					
1.2 Description of Theme Services	Investigation of Internal fraud and corruption. Investigation of Housing and Council Tax Benefit fraud. The assistance in the reduction of incorrect Housing and Council Tax Benefit awards The participation and co-ordination of the Audit Commissions National Fraud Initiative (NFI) The administration of the Housing Benefit Data Matching Service (HBMS) Delivery of a comprehensive Fraud Awareness and Education Programme.				
1.3 Division Description & Structure Diagram					
2. Key Priority Pla	ns 2007/8				
2.1 Key Objective	Compliance with the KPP in relation to the number of cases referred for sanction.				
3. Meeting Key Se	rvice Objectives 2007/8				
3.1 Key Themes	Objective				
Objectives	eview Counter Fraud Framework				
	Review and engage all existing internal & external Key Partner Protocols				
	Develop and deliver a new Fraud Awareness & Induction programme.				
	Develop and deliver bespoke Fraud Awareness training to individual services within the Council.				
	Develop the CAFT internet & intranet sites				

		FT communications strategy						
	Successful Corporate Perfo							
		Implementation of new database – INTEC						
3.2 Priority Improvement Initiatives	Initiative Review Counter Fraud Framework	Target Date	Completion Date	Lead				
	Although the review of the Counter Fraud Framework was completed in 06/07, the recent move of CAFT to the new Corporate Governance Directorate has resulted in a further review being required.	Quarter 1 (Dependent on the final structure of the new Corporate Governance Directorate)	Ongoing	CAFT Management Team (CMT)				
	Initiative Review and engage all existing internal & external Key Partner Protocols	Target Date	Completion Date	Lead				
	Although the review of the Key Partner Protocols was completed in 06/07, the recent move of CAFT to the new Corporate Governance Directorate has resulted in a further review being required.	Quarter 1 (Dependent on the final structure of the new Corporate Governance Directorate)	Ongoing	СМТ				
	In addition to this, the	Quarter 1	Ongoing	CMT				

CAFT are always looking to develop further Key Partner Protocols. e.g. HMRC & Met Police.	(Dependent on the final structure of the new Corporate Governance Directorate)		
Initiative	Target Date	Completion Date	Lead
Develop and deliver a new Fraud Awareness & Induction programme.			
The Fraud Awareness & Education Programme requires an annual review.	Quarter 2	Ongoing	СМТ
A delivery plan identifying key risk areas will be produced.	Quarter 2	Ongoing	СМТ
Initiative	Target Date	Completion Date	Lead
Develop and deliver bespoke Fraud Awareness training to individual services within the Council.			
Promote and raise awareness of this facility in CAFT. This will be delivered on an individual requirement basis.	As & when required	Ongoing	CMT
Initiative	Target Date	Completion Date	Lead

Develop the CAFT internet & intranet sites			
Continue to build awareness of the objectives and existence of the Corporate Governance Directorate, and how the CAFT assists towards this. The main objective is promoting 'the legal, constitutional, and ethical responsibilities of members and officers, enhancing transparency, clarity and probity of decision making and promoting best governance.'	Ongoing and in continuation with the 06/07 initiative.	Ongoing	Jeff Lustig, Dorne Kanareck & Ann Rafferty.
Initiative	Target Date	Completion Date	Lead
Develop and Implement a CAFT Communications Strategy.			
Joint working with the Communications Team to develop a strategy for publicising the CAFT and its role within the Council community and with its partners.	Quarter 2 Quarter 2/3	Ongoing Ongoing	СМТ
i O a o o o a t - House House House I i a o o o o o i o	Continue to build awareness of the objectives and existence of the Corporate Governance Directorate, and how the CAFT assists towards this. The main objective is peromoting 'the legal, constitutional, and ethical responsibilities of members and officers, enhancing transparency, clarity and probity of decision making and promoting best governance.' Initiative Develop and Implement a CAFT Communications Strategy. Joint working with the Communications Team to develop a strategy for publicising the CAFT and its role within the Council community and with its	Continue to build awareness of the objectives and existence of the Corporate Governance Directorate, and how the CAFT assists towards this. The main objective is coromoting 'the legal, constitutional, and ethical responsibilities of members and officers, enhancing transparency, clarity and probity of decision making and coromoting best governance.' Initiative Develop and Implement a CAFT Communications Strategy. Joint working with the Communications Team to develop a strategy for outblicising the CAFT and ts role within the Council community and with its	Continue to build awareness of the objectives and existence of the Corporate Governance Directorate, and how the CAFT assists owards this. The main objective is promoting 'the legal, constitutional, and ethical responsibilities of members and officers, enhancing transparency, clarity and probity of decision making and promoting best governance.' Target Date Completion Date Develop and Implement a CAFT Communications Strategy. Joint working with the Communications Team to develop a strategy for obsolutionsing the CAFT and ts role within the Council community and with its

Review of curre leaflets, posters advertising etc. Organisation of Open Day for 0 Promotion of the Whistleblowing Hotline facility.	Quarter 3 Staff 7-08. Quarter 2/3	Ongoing Ongoing	CMT
Initiative	Target Date	Completion Date	Lead
СРА			
Ensure CAFT in criteria under the O7/08 CPA (Per Measures and learning that rest continue to be a activities which prevent, detect error and inaccivities within the benes To ensure that evidence is document to the continue to be a activities which prevent, detect error and inaccivities within the benes to ensure that evidence is document.	e new formance Enablers). ources allocated to reduce, fraud and uracies fits system. all umented.	Ongoing	CMT & Benefits Management Team
Initiative	Target Date	Completion Date	Lead

	Implementation of new database - INTEC					
	To implement a new bespoke dedicated Fraud Management System – INTEC. This system provides the facility to gather and record Intelligence, record data & evidence and actively assist in Corporate & Benefit Fraud Investigations.	Quarter 1	Ongoing		Ann Raffe	erty
	The system will profile and identify current fraud trends and hotspots.					
3.3 Risk	Local Objective	Risk	Likelihood (H, M, L)	Impact (H, M, L)	Mitigating Action	Lead Officer
	Priority Improvement In	itiative Risks				
	Delivery of Fraud Awareness and Education Programme.	Inability to provide the training programme across the Authority due to lack of resources and skills.	Н	Н	Develop skills within the team to increase the number of facilitators who can deliver the training.	Clair Green
	Retain trained staff within the CAFT.	Workloads, Stress, Pay, Poor conditions of service	М	Н	Training Plan, Recruitment	CMT

Recruit additional qualified staff as & when required.	Inadequate training. Market conditions, Unfilled posts.			Strategy.	
Reduce sickness levels	Impact on workloads, targets and possible CPA score.	М	Н	Corporate procedure in place. Managers to be proactive and aware of proper procedures. To be addressed during staff 1-2-1's and at CMT	СМТ
Mitigate delay and non- compliance with procedures and external returns	Council's position or reputation compromised by poor performance, negligent or incorrect advice.	М	Н	Regular reviews of casework, monitoring at appraisals. I21s, effective training plans.	CMT
Health and Safety of staff	Abusive and / or violent behaviour towards staff.	L	М	Procedures in place and regularly tested.	CMT
New database not implemented	Inability to introduce new Fraud Management System – Inability to record statistics, management information. Work within Criminal Procedures and Investigation Act law. Inability to gather	L	Н	Implementation Plan drawn up with deliverables defined. Contingency plan and specific ICT support to be identified Regular monitoring of the above with	Ann Rafferty

Effective Training	intelligence for proactive and operational working. Learning development not maintained. Changes in legislation and investigative working practices not recognised leading to possible inappropriate / illegal action taken on case work	М	Н	feedback from the supplier. Training and development plan. Regular case reviews Performance monitoring, Pls and appraisals.	CMT
Adequate resources in the CAFT	Inability to carry out functions due to lack of staffing / financial resources. Financial loss to the authority as fraud goes undetected	L	Н	Management to be aware of future changes to enable service to make appropriate bids for funding. Monitoring by management, liaison with other services. All internal corporate investigation are considered for recharge.	СМТ
Meeting objectives/targets	Failure to meet targets, performance indicators,	M	Н	Risk assessment & intelligence grading	CMT

	objectives and CPA score. Therefore damaging service delivery, reputation of LBB and CPA score. Financial loss to the authority as fraud goes undetected			of all referrals to prioritise workload. Accurate capture of data on monthly PIs Monthly CMT to identify issues & take remedial action	
Planned proactive investigations	Inability to undertake planned proactive investigations due to the high level of reactive investigations.	Н	Н	Assessment of referrals via INTEC will identify specific areas for proactive investigations by identifying trends/hotspots through intelligence gathering. All investigations are graded using the 5x5x5 National Intelligence Model To be discussed by Intel Manager at each 121 and at CMT.	СМТ

	Effective and current Intelligence gathering	CAFT is not fully aware of all local knowledge that can be utilised in the prevention, detection and investigation of fraud. No system of dissemination to CAFT/Key partners.	Н	М	This is part of work of the Intel Team within the CAFT. They have a bulletin board, team newsletter, briefings, up to date contact list and visuals to show performance against target. They hold regular liaison meetings with Key Partners.	Ann Rafferty
	Emergency/Business Continuity	CAFT is unable to operate due to an emergency/ office is required to house employees identified in the Corporate Business Continuity Plan as critical workers etc. No facility to deliver a service, CPA score compromised and financial loss to LBB as fraud goes undetected.	M	Н	A Corporate Emergency/Business Continuity Plan is currently being re – designed and CAFT will feed into this. In addition there is a strategy plan in the event that the CAFT office is unavailable which allows us to continue with our service.	Dorne Kanareck CMT
3.4 Equalities	Corporate Governance has	an Equalities Plan that is mor	nitored an	d regularl	y reviewed which CAFT	feed into.

4. Workforce Planning

4.1 Learning & Development	CAFT have a service specific Learning & Development Plan that links into the Corporate Governance Training Plan.
	CAFT are developing bespoke training for specific service area requirements
	CAFT will continue to deliver the Fraud Awareness and Education programme through the authority and to its partners.

