



North Hertfordshire District Council

Finance Audit and Risk Committee

September 2024

Anti-Fraud Report 2023/24

Purpose

1. Section 151 of the Local Government Act 1972 requires local authorities to make arrangements for the proper administration of their financial affairs.
2. The Chartered Institute for Public Finance and Accountancy publicised its *Code of Practice on Managing the Risk of Fraud and Corruption* in 2014.
3. In March 2023, this committee approved the Anti-Fraud Plan for following 12 months which was developed with the Council's senior officers in partnership with SAFS. A copy of the Plan can be found here:

[\(Public Pack\)Agenda Document for Finance, Audit and Risk Committee, 08/03/2023 19:30 \(north-herts.gov.uk\)](#)

4. This report provides details of the work undertaken by the Council and the Shared Anti-Fraud Service to protect the Council against the threat of fraud and the delivery of the Council's Anti-Fraud Plan for 2023/2024.

Recommendations

5. **Members are RECOMMENDED to:**
 - a) **Note the activity undertaken by the Shared Anti-Fraud Service (SAFS) to deliver the 2023/2024 Anti-Fraud Plan for the Council.**
 - b) **Note all Anti-fraud activity undertaken by Council Officers and SAFS to protect the Council and the public funds it administers.**

Background

6. National reports and alerts continue to be used by the Shared Anti-Fraud Service (SAFS) to ensure that the Council is kept up to date of all new and emerging fraud threats. This helps to mitigate or manage the Council's fraud risks through a programme of work including the Anti-Fraud Plan. Details of these reports, along with other recommended reading for Members, can be found below and at **Section 61** of this report.

7. Some of the most significant recent reports include:

Fighting Fraud and Corruption Locally a Strategy for the 2020's. This strategy focuses on the governance and 'ownership' of anti-fraud and corruption arrangements. The Strategy also identifies areas of best practice and includes a 'Checklist' to compare against actions taken by the Council to deter/prevent/investigate fraud. The checklist is maintained and reviewed by SAFS and officers.

UK Fraud Strategy 'Stopping Scams and Protecting the Public. The Government launched its latest anti-fraud strategy in 2023 aimed at bringing government, at all levels, and the private sector together to tackle fraud, pursuit and punishment of fraudsters, providing more recognition/awareness of fraud and how to avoid it.

Lost Homes, Lost Hope. This paper, published by the Fraud Advisory Panel & Tenancy Fraud Forum in April 2023 uses previous research and current data to estimate the volume and cost of fraud in the social housing sector and the impact of this on local government.

8. The Public Sector Fraud Authority (Cabinet Office) estimated, in its 2023 ***Cross Government Fraud Landscape Report***, that fraud and error cost the public purse at least £33bn each year. The last time that any effective national fraud measurement took place in local government was in 2017 and at the time fraud loss alone was estimated at 2.4bn annually.
9. The Public Sector Fraud Authority (Cabinet Office), Department for Levelling Up, Housing and Communities (DLUHC), National Audit Office, and CIPFA all continue to issue advice, and best practice to support local councils in the fight to combat fraud and prevent loss to the public purse.
10. It is essential that the Council has in place a framework that recognises its fraud risks and invests sufficient resources prevent and deter fraud, including effective strategies and policies, and a response to deal with alleged fraud when required.
11. North Herts Council is a founding partner of the Shared Anti-Fraud Service (SAFS). Members of this Committee and Senior Management Team have received reports about how this service works closely with the Shared Internal Audit Service and all services across the Council.

Report - Delivery of the 2023/2024 Anti-Fraud Plan

2023/2024 Plan

12. The Anti-Fraud Plan for 2023/24 was designed to meet the recommendations of the Fighting Fraud and Corruption Locally Strategy (FFCL), adopting the five 'pillars' of Protect, Govern, Acknowledge, Prevent and Pursue.
13. The Plan was developed to meet the Council needs based on known risks and a historic process in responding to these as well as any new and emerging risks. Resources and staffing were based on the Councils contribution to SAFS and an agreed work-plan of activity across the Council including both proactive and reactive projects.
14. The Plan included Key Performance Indicators (KPIs) for SAFS which were agreed with senior officers. KPI performance can be found in **Appendix 1**.
15. Members will note this Committees role in ensuring that the Council meets its objectives to deter, prevent and pursue fraud.

Staffing & SAFS Performance

16. The SAFS Team (in April 2023) was composed of 23 accredited and trained counter fraud staff and is based at the Council's offices in Hertford.
17. Each SAFS Partner receives dedicated support and access to SAFS and for 2023/24 this was achieved by allocating a set number of operational days that could be drawn on to deliver all parts of the Anti-Fraud Plan. This might include work on fraud-risk assessment, fraud awareness training, proactive work such as the use of data-analytics or reactive work as part of the Councils fraud response. Providing the service in this manner allows more flexibility and resilience for SAFS in how its officers deliver the different elements of the plan.
18. For 2023/24, SAFS planned to provide 285 operational days to deliver the Councils Anti-Fraud Plan and as well as the programme of work agreed this was supported the SAFS management team. We were only able to record 239 days due to issues with a new Case Management System (CMS) introduced in April 2023 and the need to re-train staff on time recording during Q1/Q2 due to those issues. By Q3 we were reporting the correct number of days and based on this we believe that the Council received its full allocation of days, however we are unable to use the CMS data to corroborate this,
19. All SAFS officers are all fully trained and accredited and members of the Government Counter Fraud Profession or working towards this. The Profession is made up of various streams including fraud awareness training, fraud risk assessment, investigations, intelligence, data-analytics, and investigation management.

Fraud Awareness and Prevention

20. A key objective for the Council is to develop its anti-fraud culture. The Council achieves this by ensuring senior managers and elected members consider the risk of fraud when developing policies or processes; helping to prevent fraud occurring by having effective controls in place; deterring potential fraud through external communication and highlighting the checks the Council will undertake (asking for proof of ID or other evidence to support applications/claims) or actions that it has taken (prosecutions or investigations); encouraging all officers to report fraud where it is suspected, all of the above provides a profile for the Council's stance on fraud.
21. The Councils published policy on fraud prevention can be found here <https://www.north-herts.gov.uk/fraud-prevention>
22. The council's website has links for the public to report fraud by email, telephone or using the SAFS online reporting tool. As well as encouraging the public to report any suspected fraud to the Council: <https://www.north-herts.gov.uk/report-fraud> or directly to SAFS www.hertfordshire.gov.uk/fraud.

23. Council staff can use the same methods to report fraud or they can report fraud directly to SAFS officers working on projects/cases for the Council or at workshops/ surgeries taking place at the Council offices.
24. SAFS delivered six training sessions via face-to-face and virtual means during 2023/2024 including general fraud awareness and ID Fraud. Training was also provided to members of the Finance Audit and Risk Committee on the risk and impact of fraud on local councils. Further training was provided on the services provided by National Anti-Fraud Service to Council officers.
25. The Council's e-training module for anti-fraud, anti- bribery, anti-money laundering is available for staff, SAFS promote this use of this as part of our fraud awareness sessions.
26. SAFS receives weekly/monthly/ad-hoc updates on new fraud threats or alerts from a variety of sources including National Anti-Fraud Network (NAFN), National Cyber Security Centre (NCSC), National Intelligence Service (NATIS), City of London Police & National Fraud Intelligence Bureau, Credit Industry Fraud Avoidance Service (CIFAS).

Executive Reports

27. Executive Reports (ER) analyse specific fraud incidents, providing an insight into how the fraud materialised, and making recommendations to strengthen processes and controls to prevent further fraud. These reports evaluate current controls and mitigation measures, pinpointing potential vulnerabilities and limitations that could lead to fraud. SAFS accompanies each ER with a management action plan detailing recommendations and/or best practice to be adopted.
28. SAFS provided two ER's for the Council in 2023, the first regarding the recruitment of temporary/agency staff and the second on the risks created around grant applications. Managers in the service areas affected accepted and implemented all recommendations in both ER's.
29. To address fraud threats that are prevalent across all Partners, SAFS produces generic ER's which serve the collective interest. Three generic Executive Reports were shared with the Council in 2023/24, addressing the fraud risks within payroll, multiple employment, and the issuing of mayoral certificates/ letters of thanks/ appreciation.


Fraud Risk Assessments

30. Fraud Risk Assessment (FRA) constitutes a systematic evaluation of potential fraud risks within a council, designated service area, or particular scheme or process. SAFS outlined an FRA programme for the 2023/2024. This programme included FRA's focused on internal fraud risks, fraud risks within the procurement process, and recruitment. In 2023, SAFS released a generic assessment of the risk posed of undisclosed multiple employments (polygamous working) by agency staff.

Fraud Alerts

31. In 2023 SAFS introduced fraud alerts for our partners. These bimonthly fraud alerts provide officers with national and local intelligence to strengthen controls, and consider emerging and current fraud trends and threats. SAFS published five alerts in 2023/24 covering polygamous working, payroll fraud, money laundering and the rapidly developing threat of artificial intelligence used by fraudsters.
32. Complementing the bimonthly alerts are SAFS 'real time' fraud risk reports. These reports are circulated as soon as a significant risk is identified. In 2023/24 SAFS circulated five real time threat alerts which included internal fraud, cheque fraud, email account compromise and mandate fraud.

Case Study 1: Typical Fraud Alert issued by SAFS



Fraud Alert

December 2023 – January 2024

This report provides SAFS partners with the latest local and national fraud threats that local authorities have experienced over the last quarter. The purpose of the report is to provide council employees with relevant intelligence to assist protect, prevent and mitigate against continued and persistent threats, as well as new and emerging ones.

NOT FOR WIDER CIRCULATION WITHOUT CONSENT

Microsoft User Credential Compromise

A finance officer received an email from a company they recognised, which contained a hyper link. The email appeared legitimate, but unknown to the council, the company had suffered an ICT breach..

The hyperlink redirected the officer to a fake Google page which requested their Microsoft credentials. This fake Google page captured their credentials and immediately used them to access the employees Microsoft account. This generated a multi factor authentication (MFA) prompt which the officer accepted believing it was a legitimate authentication.

The fraudster gained access the officers Office 365 account creating an email chain of communication with relevant officers within the authority, effectively approving a payment to a pension fund. The false email included a fake invoice and bank details for the transfer of 1.1 Million Euros, which was sent to the Treasury department from the compromised user.

Fortunately, the fraud was prevented when a very diligent officer in the Treasury Department identified that the bank details did not match previous transfers, and the request was queried.


Source: Powys County Council

SAFS Advice

- ALWAYS** hover over an embedded hyperlink to reveal where it is redirecting you. If it does not appear correct do not click on it. Contact the sender immediately on a previously used and trusted email address.
- Check contracts to ensure third party companies are mandated to notify the LA of any ITC breaches experienced. Vary contracts if required.

Artificial Intelligence - Invoice Fraud

SAFS recognise that the threat posed by AI is evolving at a rapid pace. To ensure that our partners remain informed and prepared to address emerging threats, we are committed to regularly reporting on these developments. This will enable you to implement effective processes and controls to mitigate new and emerging fraud risks.



A cybercriminal group known as GXC Team specialises in crafting AI tools to create fraudulent invoices used in mandate/invoice fraud attacks. On December 30, they unveiled an updated version of their AI-powered tool, named "Business Invoice Swapper", which is available to purchase on the dark web. The tool works by using compromised email accounts, which are scanned to identify messages that either mention invoices or include attachments with payment details. Upon detection, the tool alters the banking information to that specified by the fraudster. The altered invoice is then either replaced in the original message or sent to a predetermined list of contacts.

The software's ability to modify invoices in real-time communication chains enhances the deception, which may cause officers to bypass procedures for verifying differences in bank account details, as the communication appears to be uninterrupted from the supplier.

It is important to note that the majority of the identified victim accounts were located in the United Kingdom and the European Union.


SAFS Advice

- ALWAYS** follow process and procedure when managing requests for payment where bank details differ from those held.
- REMEMBER, STOP, THINK, CHECK!**

Source: securityaffairs.com (<https://securityaffairs.com/156863/cyber-crime/artificial-intelligence-tool-for-invoice-fraud.html>)

Report Fraud

If you have a concern about fraud or wish to discuss these threats in more detail please contact us.



SAFS Hotline: 0300 123 4033

fraud.team@hertfordshire.gov.uk

www.hertfordshire.gov.uk/fraud

33. SAFS maintains a close working relationship with the Shared Internal Audit Service (SIAS) with both services exchanging knowledge and best practice. The excellent relationship with the Council's Legal Team has been maintained including work on criminal litigation and policy reviews.

Case Study 2: The Comet- 8th February 2022

The former manager of Letchworth BID has been jailed for 20 months after pocketing £60,000 worth of COVID-19 grants.

Christopher Andoh-Wilson, Luton, was sentenced at St Albans Crown Court today having pleaded guilty to five offences of fraud by false representation and one of acquiring criminal property.

He had been given a suspended sentence in December 2023, but it was later discovered that two references presented to the court were forgeries.

The 32-year-old had been working as Letchworth BID manager between April 2019 and July 2021, during which time he made three applications for COVID-19 grants, including one for Letchworth BID, totalling £60,000.

When he appeared at court for sentencing in December, he presented a forged character reference from a work colleague and a letter of appreciation of his work from a Mayor of Luton, but the judge did not know that the mayor was his mother and that he had altered the date on the letter from 2021 to 2023.

Sentencing Andoh-Wilson, Judge Bilal Siddique said: "When I first sentenced you, you indicated you were apologetic and I took account of all the references.

"You are a repeat offender where there has been a breach of trust. It is now accepted you forged a character reference and forged a date on a reference from the mayor, who is your mother."

This case was investigated by SAFS for the Council and the BID and the Councils legal team instructed Counsel via HCC Legal Services to represent them in court.

In May 2024 Mr Wilson attended a Proceeds of Crime hearing at St Albans Crown Court led by SAFS Financial Investigator where he was found liable to pay the Council £80,000, with an immediate order to pay £10,000 within 3 months or face an additional prison sentence of 28 weeks.

Reactive and Proactive Fraud Investigation

34. During 2023/2024 SAFS received 117 'referrals' (allegations) of fraud affecting council services, an increase from the 80 in the previous 12 months, but still within the broad range of historical referrals and comparable to similar SAFS Partners. Reporting of suspected fraud by staff remains high and indicates that officers are aware of potential fraud risks in their service areas and report fraud when suspected.

Table 1. Types of fraud being reported (in year):

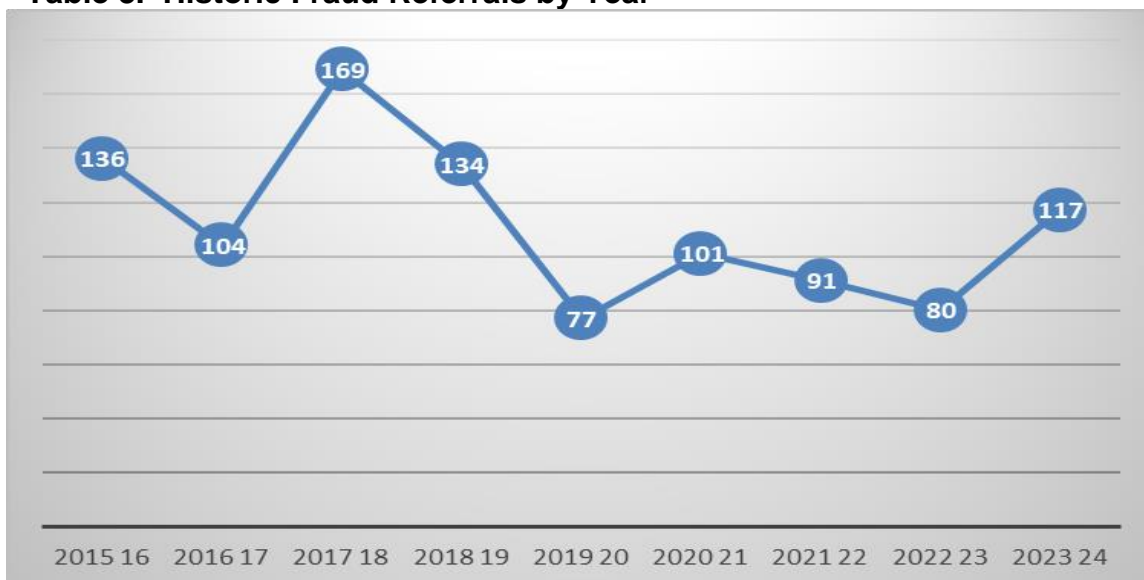
Blue Badge	Housing Benefit/CTax Fraud	Housing	Business Rates/ Grants	Procurement	Total
4	85	21	5	2	117

*Other includes Mandate & Payment/ Insurance/ Business Rates etc.

Table 2. Who is reporting fraud:

Staff	Public	Proactive	Other Agencies	Total
52	62	3	0	117

Table 3. Historic Fraud Referrals by Year



35. As table 3 shows, the volume of fraud referrals has remained broadly similar for several years with some peaks and troughs. Again these trends are very similar to other SAFS Partners.
36. It should be emphasised that not every referral will need to be investigated as some can be false, misleading, or incorrect. Every referral received is risk assessed and sifted by the SAFS Intelligence Team to determine next steps. In total, 64 allegations received in 2023/24 were not selected for investigation.

Table 4. 'Failed' Referrals

Failed Sift	No Action Required	Referred to 3 rd Party	SAFS Advice	Total
37	15	3	9	64

37. 'Failed Sift' is used where the allegation cannot be attributed to any service provided by the Council. 'No Action Required' are referrals where the subject can be identified but no error/fraud is apparent, or the Council is already aware of the facts reported in the allegation. Referrals that are passed to 3rd parties occurs where another agency, such as DWP or HMRC, is best placed to investigate the matter. 'SAFS Advice' is recorded when guidance/advice/support has been provided to Council officers, but a full investigation is not required to resolve the allegation.
38. In addition to the referrals that did not require an investigation 45 'low risk' cases, including some carried forward from 2022/23, were resolved through compliance

activity, warning letters or review. This approach identified/prevented around **£10k** in council tax and housing benefit fraud.

- 39. We continue to work with the Council’s communication team to issue publicity encouraging local residents and businesses to report fraud and help protect public funds. The Council took part in the International Fraud Awareness Week each November 2023.
- 40. At this time many cases raised for investigation last year are still live. However, of the 14 cases investigated and closed in the year, 11 identified fraud - with recoverable losses/savings combined of **£43k** reported. The volume of cases reduced from the previous year as has the value of fraud identified. Senior officers have been provided with a detailed breakdown of which services have been affected by fraud and the outcomes from individual investigations.
- 41. At year end of March 2024, 37 cases remained under investigation with an estimated fraud loss of £243k. These figures represent a slight increase in the number of live cases, with a significant increase in the value of estimated fraud under investigation (36 cases and an estimate of £145k loss in March 2023). SAFS monitor these figures to identify trends, such as changing working practices, the cost-of-living crisis and other factors.

Table 6. Fraud Investigations Closed by Year



- 42. Although we are seeing a decline in the number of fraud cases requiring full investigation the number of cases being resolved through ‘compliance’ (45 in 2023/24) or the use of warning letters is increasing across many SAFS Partners. Both methods are delivering increased assurance in the volumes of fraud occurring and providing these more speedily preventing high levels of ongoing fraud loss.
- 43. We work operationally with a number of partners locally and regionally to enhance our investigation capacity and outcomes. This includes joint working with the DWP on Housing Benefit and Council Tax linked cases where

Hertfordshire LA's are leading the way in their approach to this often complex area of collaboration.

44. As well as the financial values identified, SAFS works with the council's housing needs and nominations team where allegations of fraud impact on the Councils housing register or homelessness applications. These cases may not deliver an obvious financial value, but do assist in preventing fraudulent applications for housing.

Case Study 3: Housing Fraud.

A Hitchin resident made an application for housing at NHDC in 2020, the applicant declared they were living in one room at their parents' home with a dependant child. The applicant was contacted by the Councils Lettings Team asking if any changes in circumstances had occurred. A response was received declaring no changes.

During a routine check in 2023 information linked the applicant to an address in Luton.

An investigation was opened by SAFS as it was suspected the applicant may have provided false circumstances. Financial data showed bank account addresses had been changed to the Luton address during 2021, geographic spend, financial links to another person.

Other data obtained that assisted in supporting the applicant was resident at the Luton Property, and that the applicant appeared to be the tenant of that address.

During an interview with SAFS Officers the applicant stated that they were not aware they were still on the housing register, or think to notify that they had obtained a tenancy and a home in Luton. The applicant could not provide an explanation about why they had provided information they were still living in Hitchin to NHC when confronted with the evidence and admitted to obtaining a joint tenancy with her partner in Luton and that they had falsely represented their circumstances to NHC since 2020.

Due to the due diligence of the Council officer and the SAFS investigation the person was removed from the housing register and banned from re-applying for housing with NHC for 5 years.

45. In April 2023 the Fraud Advisory Panel (FAP) published a report 'Lost Homes-Lost Hope' following up from a paper published in 2021 by the Tenancy Fraud Forum 'Calculating Losses from Housing Tenancy Fraud', both papers were supported by CIPFA, CIFAS, the Cabinet Office and the Chartered Institute of Housing.
46. The 2021 report calculated the losses of an average housing fraud, per case, to the public purse to be in the region of £42k, of which £36k is attributable to the cost for local authorities through the provision of temporary accommodation as a result of the fraud.
47. North Herts Council does not hold stock itself relying on social housing providers within the Councils boundaries to supply properties for residents in need of housing. These providers have neither the legislative powers nor the skills to investigate housing fraud or illegal sub-letting.

Case Study 4: Social Housing Fraud		
Category	National Average cost	Explanation
<i>Add:</i> Annual average temporary accommodation cost per family for individual councils	£12,100	Individual councils can establish their own local cost for this element. This can vary considerably, exceeding £20,000 pa in some areas. (The national average figure was derived from the parliamentary briefing paper <i>Households in temporary accommodation</i> , as at 31 March 2020.)
<i>Deduct:</i> Individual councils (only) can remove the annual average housing benefit associated with their temporary accommodation costs	Does not apply to the national calculation	Local councils receive housing benefit payments from central government in relation to temporary accommodation costs. These could be deducted from the national figure to reach a net local cost. However, since these benefit payments are from central government they must be part of the calculation of the true cost of tenancy fraud to the national public purse.
Subtotal	£12,100	
Subtotal above multiplied by 3	£36,300	Analysis of tenancy frauds detected by housing providers reveals three years to be a prudent average duration for one of these frauds. (Typical range 3.2 to 3.5 years.)
<i>Add:</i> Average investigation costs	£1,300	Average cost derived from investigations by a housing provider; confirmed as prudent by a sample from other HA's and councils. Individual councils may choose to input their own data here.
<i>Add:</i> Average legal costs	£1,000	Average cost derived from investigations by a housing provider; confirmed as prudent by a sample of other HA's and councils. Individual councils may choose to input their own data here.
<i>Add:</i> Average void costs	£3,140	Average cost derived from investigations by a housing provider; confirmed as prudent by a sample of other HA's and councils. Individual councils may choose to input their own data.
Total costs	£41,740	The average cost of a detected tenancy fraud to the national public purse - approximated to £42,000.

48. SAFS work with a number of social housing providers, including Settle Housing, to help identify fraud such as illegal sub-letting, fraudulent right-to-buy applications and other misuse of the social housing stock. In 2023/24 SAFS investigated two cases of tenancy fraud where the properties were recovered and re-let to residents from the Councils housing register, this could have saved the Council upto **£72k**.
49. As well as bringing prosecutions for those committing fraud the Council can apply financial sanctions or penalties in cases of council tax fraud as an alternative to criminal prosecution. But, sanctions are not always appropriate.

Case Study 5: Council Tax Fraud.

In July 2022 the Councils Revenue Team referred a case of alleged Council Tax to SAFS. An allegation had been received that a Letchworth resident who was claiming variety of benefits and discounts had failed to declare that another person was living at their address.

SAFS investigation revealed through financial data and information from a social housing provider that another person had been living at the address between 2021 and 2022, but the resident had failed to declare this.

SAFS wrote to the resident asking them to confirm the details of the other occupant and, although they denied that anyone was resident initially, they subsequently made contact and admitted they had failed to declare the correct circumstances.

Claims for HB, CTRS were adjusted to take account of these new facts and the resident was found to have been overpaid more than £6,000 in benefits and discounts

As the resident had admitted the offending and the priority for the Council was to recover the sums overpaid a decision was made not to prosecute or add any financial penalties on this occasion.

Data Matching and Analytics

50. The Council is required to submit data every two years as part of the Cabinet Office mandated [National Fraud Initiative - GOV.UK \(www.gov.uk\)](https://www.gov.uk). For the Council datasets such as payroll, pensions, creditor/payments, housing benefit and council tax are provided in October. The data collected from Councils, NHS and others is then analysed to identify discrepancies and potential fraud. The exercise also uses data from sources such as Operation Amberhill, HMRC, DWP and GRO.
51. The output, or 'matches', from NFI is released to Councils between February and March following the October data upload. These matches are shared in various formats for Councils to action. For the Council, SAFS and Internal Audit administer access to and reporting for those service areas that are required to provide a response.
52. The Council received 667 matches for review in a number of reports from the 2022/2023 exercise. Many of these matches require administrative review only and will not identify fraud, error, or savings, but it is essential that all are actioned and reported to avoid any fraud being missed and ensure that the Councils data is amended/updated.
53. SAFS and Council officers have reviewed a number of the high priority matches and some of the lower priority matches – in total 546 reviews were conducted identifying 17 errors/frauds, with reported loss/savings combined of **£69k**. Five matches were still under review at year end.
54. Working with the Cabinet Office, SAFS manage the 'Hertfordshire FraudHub' for all SAFS Partners following a similar process to the two-yearly NFI exercise, but with data collected and matched more frequently throughout the year. In 2023/2024 SAFS identified around 3k potential matches for review and from these 114 high risk matches were fully reviewed with **£17k** in fraud prevention recorded. SAFS are working closely with service managers to ensure we can provide an improved response to matches from the FraudHub in 2024/25.
55. The Councils Revenue and Benefits Service joined the County Council funded AnalyseLocal system that helps to identify potential fraud in the small business reduction scheme. Previously funded by SAFS this system has identified significant error/fraud in the data held by the Council. The benefit for this work will be reported in 2024/25.
56. SAFS manages the Hertfordshire Council Tax Framework for all councils across the County. The framework is funded by the County Council and provides a fully managed service to review discounts claimed by residents. The Councils Revenues Team made use of the Framework in 2023/2024 to conduct a review of properties that were in receipt of a single person discount or which were recorded as being empty for at least 6 months.
After the review 616 discounts were removed (this is still subject to review at present) generating new council tax bills with a value of **£264k**. The Empty Homes Review identified, from 979 properties registered as empty, that 154 were

actually occupied generating potential income to the Council of **£318k** in *New Homes Bonus*.

Transparency Code – Fraud Data

57. The Former Department for Communities and Local Government, now Department for Levelling-up Housing and Communities (DLUHC), published a revised Transparency Code in February 2015, which specifies what open data local authorities must publish.
58. The Code also recommends that local authorities follow guidance provided in the following reports/documents:

The National Fraud Strategy: *Fighting Fraud Together*
(<https://www.gov.uk/government/publications/nfa-fighting-fraud-together>)

CIPFA– *Managing the Risk of Fraud – Actions to Counter Fraud and Corruption*
http://www.cipfa.org//media/files/topics/fraud/cipfa_corporate_antifraud_briefing.pdf

59. The Code requires that Local Authorities publish the following data in relation to Fraud. The response for North Herts Council for 2023/24 is in **bold**:

- Number of occasions they use powers under the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014, or similar powers.

Nil. (North Herts Council is a Partner to the Hertfordshire Shared Anti-Fraud Service and makes use of the National Anti-Fraud Network (NAFN) to conduct such enquiries on their behalf).

- Total number (absolute and full time equivalent) of employees undertaking investigations and prosecutions of fraud.

1.5 FTE

- Total number (absolute and full time equivalent) of professionally accredited counter fraud specialists.

1.5 FTE

- Total amount spent by the authority on the investigation and prosecution of fraud.

£89,180 (SAFS fee)

- Total number of fraud cases investigated.

14 Fraud cases investigated and closed in year

60. In addition, the Code recommends that local authorities publish the following (for *North Herts Council Fraud/Irregularity are recorded together and not separated*):

- Total number of cases of irregularity investigated-

See above

- Total number of occasions on which a) fraud and b) irregularity was identified.

11 Occasions where fraud identified

- Total monetary value of a) the fraud and b) the irregularity that was detected.

Reactive - £43k fraud loss/savings reported.

Housing related fraud- £72k based on FAP valuation

Proactive- £69k of fraud was identified through NFI.

Council Tax (SPD) Review - £264k

Council Tax (EH) Review - £318k

Total - £766k of fraud and irregularity identified.

- Total monetary value of a) the fraud and b) the irregularity that was recovered.

Not recorded separately

61. List of Background Papers - Local Government Act 1972, Section 100D

(b) Councillors Workbook on Bribery & Fraud Prevention (LGA 2017)

(c) Fighting Fraud and Corruption Locally - A Strategy for the 2020's (CIPFA/CIF9AS/LGA 2020)

(d) Tackling Fraud in the Public Sector (CIPFA 2020)

(e) Code of Practice - Managing the Risk of Fraud and Corruption (CIPFA 2014)

(f) Fighting Fraud - Breaking the Chain (Report of Session 2022-2023 House of Lords)

(g) HMG Fraud Strategy - Stopping Scams, Protecting the Public (May 2023)

(h) Lost Homes, Lost Hope (Fraud Advisory Panel 2023)

Appendices

Appendix 1. SAFS KPIs for 2023/2024 and Performance

KPI	Measure	Target 2023/24	Performance 2023/2024
1	Return on investment from SAFS Partnership.	<p>Demonstrate that the Council is receiving a financial return on investment from membership of SAFS and that this equates to its financial contribution.</p> <p>A. Meetings to take place with the Councils Service Director-Resources and Service Director-Customers.</p> <p>B. Service Director-Resources will sit on the SAFS Board that meets quarterly.</p> <p>C. Regular meetings to take place with Service Leads to agree and update local work plans.</p> <p>D. Reports on progress with any area of work covered by the SAFS Partnership Agreement will be provided on request.</p>	<p>A. Meetings are diarised with the Service Director-Resources and Service Director-Customers to review SAFS work and any issues arising.</p> <p>B. Service Director-Resources is on the invite/circulation list for the SAFS Board and is invited to attend quarterly meetings.</p> <p>C. SAFS Mgt meet with lead officers in Housing/Revs & Bens regularly and other services as required.</p> <p>D. Reports are provided to the Councils FAR Committee, senior officers, external auditors and service managers as required.</p>
2	Provide an investigation service.	<p>A. 285 Days of counter fraud activity including proactive and reactive investigation work, data-analytics, training and fraud risk management (Supported by SAFS Intel/Management).</p> <p>B. 3 Reports to Finance Audit and Risk Committee.</p> <p>C. SAFS attendance at corporate governance, 'service champion' meetings, local management team meetings.</p>	<p>A. 239 (84%) days delivered.</p> <p>B. Reports to AC in September and December 2023 and March 2024.</p> <p>C. SAFS Mgt attend the Councils Corporate Governance Group.</p> <p>D. SAFS meets with service managers on an ad-hoc basis based on need. SAFS are part of the Councils Corporate Enforcement Forum.</p>
3	Action on reported fraud.	<p>A. All urgent/ high risk cases will be responded to within 24 hours.</p> <p>B. All other cases 2 Days, on Average.</p>	<p>A. SAFS CMS still unable to report on these cases specifically.</p> <p>B. ALL referrals are cleared within 24 hours on average.</p>
4	Added value of SAFS membership.	<p>A. Membership of NAFN & PNLD</p> <p>B. Membership of CIPFA Counter Fraud Centre</p> <p>C. NAFN Access/Training for relevant Council Staff</p> <p>D. 5 Training events for staff/Members in year. (To be agreed with Service leads and HR)</p>	<p>A. SAFS funds the Councils licences with NAFN & PNLD.</p> <p>B. SAFS had access to CIPFA CF services in-year.</p> <p>C. NAFN access for all SAFS and Council staff.</p> <p>D. 5+ Training events delivered across a number of service areas and for members of the FARC.</p>
5	Allegations of fraud received. & Success rates for cases investigated.	<p>A. All reported fraud (referrals) will be logged and reported to officers by type & source.</p> <p>B. All cases investigated will be recorded and the financial value, including loss/recovery/ savings of each will be reported to officers.</p> <p>C. SAFS will work with social providers across the Borough.</p>	<p>A. This is happening daily as referrals received.</p> <p>B. All cases are logged, managed, and reported on SAFS case management system (CMS) and all reports use the data from the CMS.</p> <p>C. SAFS have contracts in place to provide TF investigation function for Settle and a number of other housing providers.</p>
6	Making better use of data to prevent/identify fraud.	<p>A. Support the output from NFI 2022/23 Council services.</p> <p>B. Membership and VFM from the Herts FraudHub in 2023/24.</p>	<p>A. Council officers ensured upload of data in line with Cabinet Office deadlines and both SAFS and Council officers worked on the output from NFI. See report for more detail.</p> <p>B. This includes work to review live NDR/SBRR data held by the Council and the Herts FraudHub both of which were effective in 2023/24. See report for more detail.</p>

