



Agenda Item
No:

9

**Hertfordshire County Council
Shared Anti-Fraud Service
Report
December 2017**

Recommendation

Members are recommended to:

Note the progress against the Anti-Fraud Action Plan 2017/2018.

Contents

- Introduction
- 1. Background
- 2. Counter Fraud Activity in 2017/2018
- 3. Progress against the 2017/18 Anti-Fraud Action Plan
- 4. Transparency Code Data 2016/2017
- Appendices 1 & 2

Introduction

This report provides the Committee with details of performance against the published 2017/18 Anti-Fraud Action Plan for the Council agreed by this Committee in July 2017.

Several reports issued by Government and public sector organisations have highlighted fraud as a significant risk for local government. These reports are used by SAFS to ensure that the Council is aware of its own fraud risks and finds ways to mitigate or manage these effectively wherever possible.

These reports include:

- *Fighting Fraud and Corruption Locally 2016–2019 Strategy* produced by CIPFA in March 2016 and supported by CLG. The new strategy estimates annual fraud losses in local government at around £2.1bn (this report is based on 2013 data).
- *UK Annual Fraud Indicator* produced by PKF, Portsmouth University and Experian in May 2016 which estimates the risk of fraud losses for local government in excess of £7bn per annum (this does not include fraud in schools or care services).

1. Background

- 1.1 According to reports from the former Audit Commission National Fraud Intelligence Bureau, The National Audit Office (NAO), and the Cabinet Office, Public Sector fraud loss across local government in England exceeds £2 billion each year with some reports indicating levels considerably above this.
- 1.2 The Cabinet Office, the NAO, and the Department for Communities and Local Government have issued advice and best practice guidance, to support local councils in the fight to reduce the risk of fraud and prevent loss to the public purse. The Chartered Institute of Public Finance and Accounting (CIPFA) have also produced a Code of Practice. This advice and guidance includes the need for Councils to be vigilant in recognising their fraud risks, and to invest resources in counter fraud activities that deliver savings.
- 1.3 It is therefore essential that the Council has in place a robust framework to prevent and deter fraud, including effective strategies and policies as well as plans to deal with the investigation and prosecution of identified fraud.
- 1.4 Hertfordshire County Council is a founding member of the Hertfordshire Shared Anti-Fraud Service (SAFS) and the Host Authority for the service. Members received a detailed report in September 2015 about the creation of SAFS and how this service would work closely with the Shared Internal Audit Service (SIAS). SAFS works across the whole Council dealing with all aspects of fraud from prevention to prosecution.

2. Counter Fraud Activity in 2017/2018

Staffing

- 2.1 The SAFS team was originally made up of nine staff. This has expanded to fourteen from late 2016, when the Partnership was joined by Luton Borough Council, Aldwyck Housing Group and B3 Living Housing. The Service is based at the County Council offices in Stevenage, although staff work across various locations in Hertfordshire and Bedfordshire.
- 2.2 Each SAFS Partner receives dedicated support and response from the SAFS Team. At present the most effective way to do this is by allocating officers to work exclusively for each Partner. These officers act as the first point of contact for that partner's services, and will assist in developing relationships at a service level, delivering training, and working on local pilot projects.

Fraud Awareness and Reported Fraud

- 2.3 SAFS ensures that fraud can be reported by both staff and the public; the Council's website and intranet both have mechanisms which link to the SAFS webpage for reporting suspected fraud.
- 2.4 The SAFS webpage – www.hertfordshire.gov.uk/fraud includes an online reporting tool and information on the types of fraud the Council is subject to and the impact of this on the public purse. A confidential fraud hotline (0300 123 4033) and a secure email account (fraud.team@hertscgcsx.gov.uk) are also available for reporting fraud. These contact details have been added to Hertfordshire County Council's own website. None of these functions replace the Council's own in-house Whistleblowing reporting procedures.
- 2.5 In the first half of 2017/2018 516 allegations of fraud were received across all SAFS Partners. 89 of these related to County Council services. The service also carried forward 28 live cases from 2016/2017. SAFS have closed 65 allegations to date, and 49 cases are still under investigation at the time this report was produced.
- 2.6 The details of reported fraud and outcomes at Hertfordshire County Council are shown in the tables below:

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

Payroll /Pension Fraud	Blue Badge Fraud	Financial Fraud*	Care Services	Schools Fraud	Other Fraud **	Total
7/2	64	1	5	6	4	89

* This includes cyber-enabled fraud

** Includes contract/procurement/Insurance fraud

Table 2. Who is reporting Fraud (in Year)?

Fraud Reported by Staff	Reports from Public*	SAFS Team/ Data Matching	Other	Total
30	38	3	18	89

*includes reports following local 'Cheater Campaigns'.

Table 3. Outcomes of cases closed (in Year):

Closed No Action Required/ Passed to another Agency	Closed No Fraud Proved	Closed Fraud Proved/ Advice Provided	Closed 'No Fraud' but a Warning Letter issued	Total
26	6	7/8	18	65

- 2.7 Of those cases closed with a positive outcome two relate to County Council employees who were dismissed or disciplined following investigation. Six members of the public have been prosecuted for Blue Badge abuse or Insurance Fraud. Cases closed with a warning letter often relate to allegations of Blue Badge misuse which cannot be substantiated but where a letter is sent to remind the 'keepers' about their duty to look after their badges.
- 2.8 The SAFS work with Districts and Borough Councils has already identified fraud loss and savings against the local taxation system in excess of £80,000 in the first half year 2017/2018. Although District partners are the 'victims' in these cases the County Council is the main beneficiary from the recovery of these sums.
- 2.9 Live cases include disciplinary matters in schools for alleged misconduct related to fraud, and a number of cases alleging fraud against Adult Care Services by third parties.
- 2.10 SAFS have been working with the DWP Fraud and Error Service as part of a national pilot since early 2016. This work initially focused on 'welfare fraud' but has been so successful that the Government has announced a national roll-out in 2018, to include all areas of fraud across local government, including County Councils.

SAFS Projects at Hertfordshire County Council

- 2.11 SAFS has developed excellent working relationships with the Council's HR-Business Partners, Legal and Education Services. The relationship with the Blue Badge Team, part of Customer Services, has been particularly beneficial with SAFS helping to deliver a more robust service at point of application to prevent fraudulent applications. This in turn has been supported by SAFS activity with our District Partners.
- 2.12 The National Fraud Initiative data upload and submission to the Cabinet Office was completed by SAFS for the Council in October 2016. The Service is now reviewing all matches (30,000 across the Council) with relevant services including Concessionary Bus Passes, Blue Badge, Operation 'Amberhill', Payroll & Pensions and others, to ensure the Council complies with the statutory requirements to complete this exercise in 2017.
- 2.13 SAFS have arranged for the delivery of specialist training to teams working within council directorates such as Direct Payments, Schools SAFE-Recruiting and Schools Transport. SAFS work very closely with Hertfordshire County Council's HR Service, providing assistance in disciplinary matters. SAFS have

also worked with HR Recruiting to enhance anti-fraud measures as part of the Council's recruiting process and use of Agency Staff.

3. Progress against the 2017/2018 Anti-Fraud Action Plan

- 3.1 The Council has in place an Anti-Fraud and Corruption Policy. This document lays out the Council's position and includes advice to Members, senior officers, and staff about how to deal with identified fraud. This document pre-dates the formation of the SAFS and will be reviewed in 2017; at present it complies with best practice guidance from CIPFA/NAO/CLG.

Anti-Fraud Action Plan 2017/2018

- 3.2 The Council's Anti-Fraud Action Plan for 2017/2018, approved by Members in July 2017, covers all areas recommended by CIPFA to ensure that the Council acknowledges the risk of fraud, its responsibility to combat these risks, and appropriate action to prevent/deter/pursue fraud. Progress against the plan is shown at **Appendix 1 (Page 9)**.
- 3.3 Progress against the Anti-Fraud Action for 2017/2018 and KPIs can be seen at **Appendix 2 (Page 17)**.
- 3.4 Adherence to the proposed plan for 2017/2018 will ensure compliance with the Council's own Strategy, and the best practice guidance issued by the Government, NAO, and CIPFA.

SAFS Reports 2017/2018

- 3.5 In March 2018 SAFS will provide a revised Anti-Fraud Action Plan for 2018/2019.
- 3.6 SAFS will also provide data to meet the requirements of Transparency Code for publication by the Council by 2018 on its activity on Counter Fraud for the whole of 2017/2018.

4. Transparency Code- Fraud Data 2016/2017

- 4.1 The Department for Communities and Local Government (DCLG) published a revised Transparency Code in February 2015, which specifies what open data local authorities must publish.
- 4.2 The Code also recommends that local authorities follow guidance provided in the following reports/documents:

CIPFA: *Fighting Fraud Locally Strategy*

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118508/strategy-document.pdf).

The National Fraud Strategy: *Fighting Fraud Together*

(<https://www.gov.uk/government/publications/nfa-fighting-fraud-together>)

CIPFA Red Book 2 – *Managing the Risk of Fraud – Actions to Counter Fraud and Corruption*

(<http://www.cipfa.org/->

[/media/files/topics/fraud/cipfa_corporate_antifraud_briefing.pdf](http://www.cipfa.org/-/media/files/topics/fraud/cipfa_corporate_antifraud_briefing.pdf))

4.3 The Code requires that Local Authorities publish the following the data in relation to Fraud, The response for Hertfordshire County Council for 2016/2017 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. The 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 Staff***
- *Total number (absolute and full time equivalent) of professionally accredited counter fraud specialists. **1.5 FTE Staff***
- *Total amount spent by the authority on the investigation and prosecution of fraud. **£110,000***
- *Total number of fraud cases investigated. **30 Cases investigated and closed in year***

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

- *Total number of cases of irregularity investigated- **30***
- *Total number of occasions on which a) fraud and b) irregularity was identified. **27 occasions where fraud/irregularity identified***
- *Total monetary value of a) the fraud and b) the irregularity that was detected, and. **£227,500***
- *Total monetary value of a) the fraud and b) the irregularity that was recovered. **Not recorded.***

Appendices.

1. SAFS/HCC Anti-Fraud Action Plan 2017/2018 Page 9

2. Performance against Plan 2017/2018 Page 17

Appendix 1.

**Hertfordshire County Council
Anti-Fraud Plan
in partnership with
Hertfordshire Shared Anti-Fraud Service
2017/2018**

Contents

Introduction.....	11
The National Context	12
Action Plan 2017/2018.....	13
SAFS Resources for HCC 2017/2018.....	14
SAFS KPI for HCC 2017/2018.....	15
SAFS Standards of Service for HCC.....	16

Introduction

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

The Council's Anti-Fraud and Corruption Strategy states:

*The Primary aim of this Strategy is to make it absolutely clear to the Citizens and stakeholders of Hertfordshire County Council that, as an organisation and individuals, we are committed to honesty, openness, and propriety, in all of our dealings. Simply put, **fraud and corruption will not be tolerated.***

We will do our utmost to foster a culture in which fraud and corruption can find no foothold, and any attempt to conduct illegal activity, either internal or external, against the Council will be met with a united and resolute front.

This plan includes objectives and key performance indicators to measure the Council's effectiveness against its Strategy and meet the best practice guidance/directives from central government department such as Department for Communities and Local Government and other bodies such as National Audit Office, the Chartered Institute for Public Finance and Accountancy and The European Institute for Combatting Corruption and Fraud.

National Context.

In its 2015 publication '**Code of practice on managing the risk of fraud and corruption**' CIPFA highlights five principles outlining public bodies' responsibility to embed effective standards for countering fraud and corruption in their organisations. This supports good governance and demonstrates effective financial stewardship and strong public financial management

The five key principles of the code are to:

- 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 Chartered Institute for Public Finance and Accountancy (CIPFA) **Local Government Counter Fraud and Corruption Strategy (2016-2019)** included a summary of fraud losses across councils in England.

- Actual fraud losses reported by local government in 2013 totalled £207m (this excludes housing benefit)
- Hidden fraud loss for local government was estimated at £1.9bn.
- As admitted previously by the National Fraud Authority in 2013 the scale of fraud against local government is large, but difficult to quantify with precision.
- The strategic response to fraud threats contains three main principles 'Acknowledge/ Prevent/ Pursue'. The Anti-Fraud Action plan for Hertfordshire County Council adheres to these three principles

SAFS/ HCC Anti-Fraud Action Plan 2017 2018					
Mission	Objectives	Goals	Strategies	Measures/Success Criteria	Responsibility
ACKNOWLEDGE	ACKNOWLEDGEMENT The risk of fraud and the Councils responsibility to prevent and investigate fraud	Show the Councils Willingness to Combat Fraud	Anti- Fraud Strategy Membership of SAFS Internal Audit Member Support	Have in place an Anti-Fraud and Corruption Strategy & Develop and Fraud Risk Assessment Tool for HCC and individual services Retaining Board Membership of SAFS Have in place an effective IA Plan and Audit Committee Policies to deal with Money Laundering/ Bribery/ Whistleblowing/ Sanctions	Head of Assurance S.151 Officer Audit Manager Head of Legal
	FRAUD AWARENESS Promote an effective anti fraud culture within the Council	Enhance the level of fraud awareness internally and externally	Local News Media Promote Fraud Team Fraud Awareness Training Internal Awareness	Issue a press release for every successful prosecution in 2017/2018 Promotion of internet fraud pages (SAFS) and local media exposure Deliver ten fraud training awareness training sessions to Council Staff, or tailored training as requested by services Conduct an E-Survey of fraud awareness across officers	SAFS/Comms SAFS/Comms SAFS SAFS
PREVENT	CUSTOMER SERVICE Service performance is managed to the highest standards so that agreed levels of service are met	Ensure customers and staff are informed about counter fraud work	Customer Service Work across all Services SAFS and SIAS Reports to Audit Comms	Issue customers with information leaflets when attending interviews HCC S.151 and Head of Assurance Review SAFS Activity SAFS and SIAS Mgrs Meetings and SAFS Mgr with Head of Assurance 2 Reports to Audit Committee	SAFS s.151/ Head of Assurance SAFS/Audit Managers SAFS
	PERFORMANCE Maximize performance through robust risk assessment and quality investigation work.	Be recognised as a high performing and successful fraud team.	Quality Fraud Referrals Individual Targets Data Matching Fraud Referrals Performance Report	100% risk assessment on all fraud referrals received SAFS CFO- Set PMDS Targets to match HCC KPIs NFI Data Matches 2017 to be reviewed in year Monitor source of fraud referrals each quarter Issue a performance report in April 2018	SAFS SAFS SAFS SAFS SAFS
PURSUE	QUALITY INVESTIGATIONS Undertake high quality investigations maximizing all investigative resources and achieving value for money	Ensure that investigations comply with the law and are beyond reproach	Interview Under Caution Sanction Files Witness Statements Legal Services	SAFS management checks on all sanctions issued File management checks on live caseload 100% check on witness statements used in prosecution cases Develop relationship with HCC Legal and High Street Solicitors for best service to SAFS and HCC	SAFS SAFS SAFS SAFS/ Head of Legal
	SANCTIONS/PROSECUTIONS Instigate legal sanctions to counter criminal behaviour	Ensure the 'prosecution' of fraud and dishonesty in appropriate cases	Prosecutions/ Sanctions Disciplinary/Professional Civil Recovery Legal Service Liaison	Ensure all cases suitable for sanction are reviewed in line with Policy Ensure that where fraud/corruption/bribery involves HCC staff this is dealt with in line with all relevant Policies Ensure that where HCC suffers a loss this is recorded and services encouraged to recover this from the debtor Continue to work with Legal and maximise recovery of costs and compensation to HCC	SAFS SAFS/Head of HR SAFS/S.151 SAFS/ Head of Legal

SAFS Resources 2017/2018

Budget

In December 2016 the SAFS Board accepted a report from the SAFS Manager to restructure and reorganise the Service from April 2017/2018. This restructure would result in an increase in fees for all Partners. The Board agreed that the annual fee for Hertfordshire County Council, would be fixed to £110,000 +VAT. The Board also received assurance from financial modelling that the service would be sustainable, in its current form for 5 years with an increase in fees each year at 1% from 2019 onwards.

It has been agreed that the service would be allowed to build up a small operating reserve but should this be exhausted all Partners agree to meet any shortfall in Budgets equally.

Staffing

The full complement of SAFS now stands at 14.5 FTE's; 1 Manager, 2 Assistant Managers, 8 Investigators and 2 Intelligence Officers. The Team is also supported by 1 FTE Data-Analyst and 0.5 FTE Business Support who are funded from SAFS Budgets.

For staffing – Hertfordshire County Council will have exclusive access to 1 FTE Investigator, access to intelligence functions of the service, all data-matching services being offered through the local data-warehouse and call on the SAFS Manager & Assistant Manager for quarterly liaison meetings, management meetings and two Audit Committees reports per annum. SAFS also have access to an Accredited Financial Investigator (AFI) and criminal litigation services. SAFS will also work alongside specialist teams such as HR, Comms, Litigation and Commercial Law and Trading Standards.

SAFS

KPIs for HCC 2017/2018

KPI	Measure	2017/2018 Target	Quarterly Target	SAFS Project Aims
1	Provide an Investigation Service	1 FTE on call at the Council (supported by SAFS Intelligence/ Management). Membership of NAFN Membership of CIPFA Counter Fraud Centre Access to Case Management System (CMS) Local Data Hub Fraud training events for staff	100% of all	Ensure ongoing effectiveness and resilience of anti-fraud. Deliver a return on investment for the Council's financial contribution to SAFS.
2	Identified Value of Fraud prevented/detected. Based on the Methodology agreed by SAFS Board	£300k From fraud identified and savings/prevention	£75k	Deliver financial benefits in terms of cost savings or increased revenue.
3	Allegations of fraud Received. From all sources.	100 Fraud referrals from all sources to SAFS	25	Improve the reach into the areas of non-benefit and corporate fraud within the county.
4	Success rates for cases investigated. This will ensure that quality investigations are undertaken.	60%	60%	Create a recognised centre of excellence able to disseminate alerts and share best practice nationally.
5	Conduct Data-Matching using the local data-hub, NFI and other data-matching/mining.	Data-Hub for local data matching. Access to NFI output. County wide Council Tax Review Framework.	100%	Create a data hub for Hertfordshire.

SAFS - Standards of Service.

SAFS will provide Hertfordshire County Council with the following fraud prevention and investigation services as part of the contracted anti-fraud function.

1. Access to a managed fraud hotline and webpage for public reporting.
2. Process and document for SAFS Partner staff to report suspected fraud to SAFS.
3. Assistance in the design of Council policies processes and documents to deter/prevent fraud.
4. SAFS will design shared/common anti-fraud strategies and policies or templates to be adopted by the Council.
5. SAFS will provide a proactive data-matching solution (data-warehouse) to identify fraud and prevent fraud occurring.
 - The data-warehouse will be funded by SAFS and located in accordance with Data Protection Act requirements.
 - The data-warehouse will be secure and accessible only by named SAFS Staff. Data will be collected and loaded in a secure manner.
 - SAFS will design and maintain a data-sharing protocol for SAFS Partners to review and agree to as they choose. The protocol will clearly outline security provisions and include a Privacy Impact Assessment.
 - SAFS will work with nominated officers in the SAFS Partners to access data-sets to load into the data-warehouse and determine the frequency of these.
 - SAFS will work with Partners to determine the most appropriate data-matching for each of them and the frequency of such data-matching.
6. All SAFS Staff will be qualified, fully trained and/or accredited to undertake their duties lawfully, or be working towards such qualifications.
7. All SAFS investigations will comply with legislation including DPA, PACE, CPIA, HRA, RIPA* and all relevant policies of the Council.
8. Reactive fraud investigations.
 - All reported fraud will be actioned by SAFS within 10 days.
 - The Council will be informed of all reported fraud and how SAFS are going to deal with this.
 - SAFS will allocate an officer to each investigation.
 - SAFS officers will liaise with nominated officers at the Council to access data/systems/accommodation required to undertake their investigations.
 - SAFS Officers will provide updates on cases and a report with summary of facts and supporting evidence on conclusion of the investigation for the Council to review and make any decisions.
 - Where a decision indicates an offence SAFS Officers will draft a report for the nominated officers of the Council to make a decision on any further sanctions/prosecutions.
9. Where sanctions, penalties or prosecutions are sought SAFS will work with the Council to determine the appropriate disposal based on the Code for Crown Prosecutors and the Council's published policies. Decisions on imposition of any sanction will lay with the Council but the issue of any penalty will be resolved locally on a case by case basis.
10. SAFS will provide reports through the SAFS Board on progress and to the Council's Audit Committee.
11. SAFS will provide Alerts to Hertfordshire County Council, of suspected fraud trends or reports/guidance from government and public organisations to assist in the prevention of fraud.

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

Appendix 2.

Progress and performance against Hertfordshire County Council Anti-Fraud Action Plan

2017/2018

SAFS/ HCC Anti-Fraud Action Plan 2017 2018						
Mission	Objectives	Goals	Strategies	Measures/Success Criteria	Responsibility	Achieved to 30.9.2017
ACKNOWLEDGE	ACKNOWLEDGEMENT The risk of fraud and the Councils responsibility to prevent and investigate fraud	Show the Councils Willingness to Combat Fraud	Anti- Fraud Strategy	Have in place an Anti-Fraud and Corruption Strategy & Develop a Fraud Risk Assessment Tool for HCC and individual services	Head of Assurance	Strategy in place and 'Fraud Risk' is being considered
			Membership of SAFS	Retaining Board Membership of SAFS		
	FRAUD AWARENESS Promote an effective anti fraud culture within the Council	Enhance the level of fraud awareness internally and externally	Internal Audit	Have in place an effective IA Plan and Audit Committee	S.151 Officer	Complete
			Member Support	Policies to deal with Money Laundering/ Bribery/ Whistleblowing/ Sanctions	Audit Manager	Complete
			Local News Media	Issue a press release for every successful prosecution in 2017/2018	Head of Legal	WB & Bribery complete. AML under review
			Promote Fraud Team	Promotion of internet fraud pages (SAFS) and local media exposure	SAFS/Comms	Ongoing with HCC Comms
		Fraud Awareness Training	Deliver ten fraud training awareness training sessions to Council Staff, or tailored training as requested by services	SAFS/Comms	Complete	
		Internal Awareness	Conduct an E-Survey of fraud awareness across officers	SAFS	Ongoing. 5 delivered to date	
				SAFS	In Progress	
PREVENT	CUSTOMER SERVICE Service performance is managed to the highest standards so that agreed levels of service are met	Ensure customers and staff are informed about counter fraud work	Customer Service	Issue customers with information leaflets when attending interviews	SAFS	Complete
			Work across all Services	HCC S.151 and Head of Assurance Review SAFS Activity	s.151/ Head of Assurance	Ongoing
			SAFS and SIAS	SAFS and SIAS Mgrs Meetings and SAFS Mgr with Head of Assurance	SAFS/Audit Managers	Ongoing
			Reports to Audit Comms	2 Reports to Audit Committee	SAFS	July 17/ Nov 17/ Mar 18
	PERFORMANCE Maximize performance through robust risk assessment and quality investigation work.	Be recognised as a high performing and successful fraud team.	Quality Fraud Referrals	100% risk assessment on all fraud referrals received	SAFS	Complete
			Individual Targets	SAFS CFO- Set PMDS Targets to match HCC KPIs	SAFS	Complete
			Data Matching	NFI Data Matches 2017 to be reviewed in year	SAFS	In progress
			Fraud Referrals	Monitor source of fraud referrals each quarter	SAFS	Ongoing
			Performance Report	Issue a performance report in April 2018	SAFS	Planned
PURSUE	QUALITY INVESTIGATIONS Undertake high quality investigations maximizing all investigative resources and achieving value for money	Ensure that investigations comply with the law and are beyond reproach	Interview Under Caution	SAFS management checks on all sanctions issued	SAFS	Ongoing
			Sanction Files	File management checks on live caseload	SAFS	Ongoing
			Witness Statements	100% check on witness statements used in prosecution cases	SAFS	Complete
			Legal Services	Develop relationship with HCC Legal and High Street Solicitors for best service to SAFS and HCC	SAFS/ Head of Legal	Complete
	SANCTIONS/PROSECUTIONS Instigate legal sanctions to counter criminal behaviour	Ensure the 'prosecution' of fraud and dishonesty in appropriate cases	Prosecutions/ Sanctions	Ensure all cases suitable for sanction are reviewed in line with Policy	SAFS	Complete
			Disciplinary/Professional	Ensure that where fraud/corruption/bribery involves HCC staff this is dealt with in line with all relevant Policies	SAFS/Head of HR	Complete
			Civil Recovery	Ensure that where HCC suffers a loss this is recorded and services encouraged to recover this from the debtor	SAFS/S.151	Ongoing
			Legal Service Liaison	Continue to work with Legal and maximise recovery of costs and compensation to HCC	SAFS/ Head of Legal	Complete

SAFS

KPIs for HCC 2017/2018

KPI	Measure	2017/2018 Target	Performance to 30.9.2017	SAFS Project Aims
1	Provide an Investigation Service	1 FTE on call at the Council (supported by SAFS Intelligence/ Management). Membership of NAFN Membership of CIPFA Counter Fraud Centre Access to Case Management System (CMS) Local Data Hub Fraud training events for staff	100% of all	Ensure ongoing effectiveness and resilience of anti-fraud. Deliver a return on investment for the Council's financial contribution to SAFS.
2	Identified Value of Fraud prevented/detected. Based on the Methodology agreed by SAFS Board	£300k From fraud identified and savings/prevention	Approx £60k from council tax revenue. Approx £10k from other matters.	Deliver financial benefits in terms of cost savings or increased revenue.
3	Allegations of fraud Received. From all sources.	100 Fraud referrals from all sources to SAFS	89	Improve the reach into the areas of non-benefit and corporate fraud within the county.
4	Success rates for cases investigated. This will ensure that quality investigations are undertaken.	60%	71% (15 cases from 21 closed)	Create a recognised centre of excellence able to disseminate alerts and share best practice nationally.
5	Conduct Data-Matching using the local data-hub, NFI and other data-matching/mining.	Data-Hub for local data matching. Access to NFI output. County wide Council Tax Review Framework.	Data-Hub operational. NFI ongoing. County wide framework contract signed off April 2017	Create a data hub for Hertfordshire.