

**Welwyn Hatfield Borough Council**

**Anti-Fraud Plan 2025-2026**

**In partnership with**

**The Hertfordshire Shared Anti-Fraud Service**



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## Introduction

This plan supports the Councils [Anti-fraud and corruption policy – Welwyn Hatfield Borough Council](#) by ensuring that Welwyn and Hatfield Council, working in partnership with the Hertfordshire Shared Anti-Fraud Service and others, has in place effective resources and controls to prevent and deter fraud as well as investigate and pursue fraud when it occurs.

The Councils published Anti-Fraud and Corruption Policy states;

***2.1 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.***

***2.2 The Council will fulfil the responsibility to reduce fraud and protect our resources by a strategic approach consistent with that outlined in the Fighting Fraud and Corruption Locally Strategy 2020 and CIPFA's Managing the Risk of Fraud and Corruption.***

***2.3 The Council's employees and Members have a key role in maintaining this culture. The Council has implemented effective whistleblowing arrangements and employees and Members are encouraged to raise any serious concerns about the Council's work, including any reasonable belief that fraud or corruption is occurring.***

***2.4 The desired culture is reinforced through the Council's behavioural competencies which are embedded in policies and procedures, where values of openness and honesty are specifically mentioned.***

***2.5 The Council aims to learn from any incidences of fraud or corruption and where there have been breakdowns in systems, procedures or governance arrangements, these will be reviewed and will be controls put in place to prevent a reoccurrence.***

***2.6 We will Work with our partners and other investigative bodies to strengthen and continuously improve our arrangements to prevent fraud and corruption.***

This plan includes objectives and key performance indicators that support the Councils Policy and follows the latest best practice/guidance/directives from the Ministry for Housing and Local Government (MHCLG), National Audit Office (NAO), Public Sector Fraud Authority (PSFA) 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 Fraud Advisory Panel indicating that the threat of fraud against local government is both real, causing substantial impact (including reputational, service as well as financial) and should be prevented wherever possible.

In November 2024, the National Audit Office (NAO) published its report to the new Government **The impact of fraud and error on public funds 2023-24**. The report states “Fraud and error cost the taxpayer billions of pounds each year – but most of the potential loss goes undetected. Based on the Public Sector Fraud Authority’s (PSFA) methodology, we estimate that fraud and error cost the taxpayer £55 billion to £81 billion in 2023-24. Only a fraction of this is detected and known about”. There are no accurate statistics for fraud loss/prevention in local government since CIPFA ceased its Counter Fraud Tracker in 2019/20, but it safe to say that fraud is still there and based on our own experience the risk is significant

The *Fighting Fraud and Corruption Locally, A Strategy for the 2020’s*, published in March 2020 and supported by CIPFA, the LGA, SOLCACE and External Auditors provides a framework for the Council to adopt in developing its counter fraud activity and this Anti-Fraud Plan follows the guidance and recommendations of the *Strategy*. A copy of the *Strategy* can be found at <https://www.cipfa.org/services/cipfa-solutions/fraud-and-corruption/fighting-fraud-and-corruption-locally>

The *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 including the four ‘Pillars’ of **Govern, Acknowledge, Prevent, Pursue** with an overarching aim of **Protect**:

**For the Council this includes protecting public funds it administers and protecting the Council and its residents against fraud and cybercrime.**



## **Anti-Fraud Plan 2025-2026**

The Councils Anti-Fraud Plan will be managed by the Hertfordshire Shared Anti-Fraud Service (SAFS), but officers at all levels across the Council will have responsibility for ensuring that the plan is delivered and the Council protected against acts of fraud and corruption.

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 and in particular by sharing information and knowledge. The Council has frameworks and procedures in place to prevent fraud and encourage staff and the public to report suspicions of fraud.

The Anti-Fraud Plan follows the guidelines and checklists 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 break-down of work included in the Plan can be found at **Appendix A** along with the officers with responsibility for ensuring the plan is delivered.

### **Anti-Fraud Arrangements**

The Council joined the 'Hertfordshire Shared Anti-Fraud Service' (SAFS) in 2023 and this service has provided the majority of the anti-fraud arrangements for the Council since then. The SAFS Partnership was formed in 2015 and also includes Stevenage Borough Council, Broxbourne Borough Council, Hertsmere Borough Council, Hertfordshire County Council, Luton Borough Council, North Herts Council and East Herts Council, SAFS also provides services to other public sector bodies across Hertfordshire and Bedfordshire.

SAFS Core Service is made up of 22.5 FTE staff for 2025/26. All staff are trained and accredited, specialising in fraud prevention, fraud investigation, fraud awareness, fraud risk assessment as well as proceeds of crime, anti-bribery and anti-money laundering. All staff are required to members of the Government Counter Fraud Profession (GCFP)- or working toward this via professional qualification or apprenticeships.

The SAFS Team has been nominated for and/or won awards for the services it provides including the ***Tackling Economic Crime Awards*** (TECAS), the ***Institute of Revenue Rating and Valuation Awards*** (IRRV), the ***Public Finance Awards*** (PFA), and ***Public Sector Counter Fraud Awards***.

In 2023/2024 SAFS underwent an external Peer Review with a final report provided to the SAFS Board in March 2024. This report highly commended the service provided to the SAFS Partners and the work of the SAFS Team. A number of recommendations included in the final report, to further enhance the service offering, were adopted by SAFS Management and implemented in 2024/25.

SAFS is a Partnership with each organisation paying an annual fee for Hertfordshire County Council for a contracted service for all Partners. SAFS, as a service, has a number of key objectives developed by its Management Board (the Board) and every Partner has a seat on that Board. For Welwyn Hatfield Council the **Executive Director (Finance and Transformation)** is the Board representative with the **Assistant Director (Finance)** acting as their deputy.

Although SAFS will provide 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 October 2024 the SAFS Board agreed fees for all Partners from April 2025. The Board also received assurance from financial modelling that the service would be sustainable, in its current form, for the next three years.

Fees for Welwyn Hatfield Borough Council for 2025-2026 have been agreed at £134,492+ VAT- this is an increase of 4% from 2024-2025.

The fee will not include the Councils fees for the Cabinet Office NFI and FraudHub services that will be charged directly by the Cabinet Office.

The Councils legal service, including litigation for both civil and criminal matters, all internal recharges and external fees for these services will be met by the Councils respective service areas/directorates when required.

## **Staffing**

The full complement for SAFS Core Service in 2025-2026 is planned to be 22.5 FTE.

The Council will have access to 409 days of counter fraud work (an increase on the 344 days in 2024/25), access to intelligence functions of the service, all data-matching services being offered through the SAFS Data-Hub and Herts *FraudHub* (hosted by Cabinet Office) and can call on SAFS management for liaison meetings, management meetings and three reports per annum to the Audit and Standards Committee. An Accredited Financial Investigator is available to assist in money laundering or proceeds of crime investigations.

SAFS has access to specialist IT forensics, covert surveillance and national counter fraud intelligence services provided via third parties and criminal litigation services to support the Councils legal team.

SAFS will provide fraud alerts/updates (local and national) to Council officers and senior management of all 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 (FAP), National Anti-Fraud Network (NAFN) and the Public Sector Fraud Authority (PSFA).

## **Workplans & Projects 2025-2026**

As well as an agreed programme of work (see **Appendix A**) 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>Corporate Support</b>	<p><b>General Support.</b>  Three Reports to Audit and Governance Committee.  SAFS attendance at Corporate Governance Groups and management meetings to keep fraud risks on the Council's agenda.  Assisting with the development and review of the Councils existing anti-fraud policies.  Money Laundering Reporting Officer (MLRO) role.  Assist with NFI 25/26 Output and FraudHub.  Assisting with Payroll fraud matters including disciplinary investigations.  Identify new fraud risks and fraud alerts.  Membership of various antifraud network forums including NAFN/FFCL/CIFAS/LBFIG/FAP/GCFP/PSFA  A review of the ECCTA 2023 and 'Failure to Prevent Fraud' and its implications for the Council.</p> <p><b>Training.</b>  Ten fraud training/awareness events for staff/members in year delivered face to face/virtually/hybrid.  Review the Councils I-Learn training package on fraud/bribery/money laundering.  Making the on-line training mandatory with alternative options for staff without access to the Councils intranet.</p> <p><b>Procurement.</b>  Work with SIAS and procurement to develop a bespoke risk assessment for fraud in procurement/contract.</p>
<b>Revenues and Benefits</b>	<p>Proactive training and awareness for senior leadership and front-line staff within the Shared R&amp;B Service.  Reactive investigations for HB/CTRS, incl JW with DWP/FES.  Support for SPD review for the Council via third party providers as part of the county-wide Council Tax Framework.  NFI/FraudHub output- how this can be managed in 2025/26 between SAFS and R&amp;B Mgt.</p>
<b>Housing Services</b>	<p>Proactive training and awareness for senior leadership and front-line staff. Training and awareness to be agreed.  Maintain and monitor the SLA in place between Housing Services and SAFS.  Reactive investigations for housing applications, tenancy fraud in the housing stock and support for RTB process- to include preparation of file for decisions and civil/criminal court hearings on a case-by-case basis.  Targets include:</p> <ul style="list-style-type: none"> <li>• 6-12 social homes secured from sub-letting or other unlawful tenancy breaches.</li> <li>• 100% review of RTB application. (SAFS to review all applications once eligibility confirmed).</li> <li>• 100% review of Succession applications.</li> </ul> <p>Review housing register and current housing stock using NFI and Fraud-Hub capacity to identify fraud/error including the use of local data.  SAFS to provide capacity for NFI 2025/26 and Fraudhub output and work with Housing Officers to resolve discrepancies.</p>
<b>Parking Enforcement</b>	<p>Proactive training and awareness for senior leadership and front-line staff.  Investigation into alleged misuse of BB.  Responding to allegations of misuse from the public.  BB Action Days- proactive work with CEOs in hot-spot areas agreed with LBC.</p>

## **SAFS KPIs & Standards of Service.**

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

## **SAFS - Standards of Service.**

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 via email/phone/weblinks.
3. Training in: Fraud Awareness (management/staff/members), Fraud Prevention, Identity Fraud and Money Laundering.
4. A Money Laundering Reporting Officer service as laid out in the relevant Council policies.
5. Assistance in the design/review of Council policies, processes, and documents to deter/prevent fraud.
6. SAFS will review all anti-fraud strategies and policies or templates used by the Council.
7. SAFS will continue to develop a data-matching solution (NFI- Herts *FraudHub*) to assist in the identification of fraud.
  - The FraudHub will be funded by the Council.
  - The FraudHub will be secure and accessible only by nominated SAFS and Council officers.
  - 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 datasets (and frequency) of the upload of these.
8. All SAFS Staff will be qualified, trained and/or accredited to undertake their duties lawfully.
9. All SAFS investigations will comply with legislation including DPA, GDPR, PACE, CPIA, HRA, RIPA\* and relevant Council policies and processes.
10. Reactive fraud investigations.
  - Any high profile, high value, high risk cases or matters reported by senior managers will receive a response from SAFS Mgt and be added to the Management Tracker so they are prioritised appropriately.
  - 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 Council officers 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 decide on any further sanctions/prosecutions.
11. 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.
12. Where any investigation or review identifies any system/process weakness SAFS will provide a confidential report to the relevant head of service of director with recommendations on management/mitigation.
13. SAFS will provide Alerts to the Council, of suspected fraud trends or reports/guidance from government and public organisations that are relevant to fraud.
14. SAFS will provide reports to senior management on the progress with delivery of this Plan and any other relevant activity planned or otherwise.
15. 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, 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.*

Appendix A.

WHBC / SAFS Action Plan 2025/2026

FFCL Pillars	Objectives	Activities	Responsible Officer
Governance	Having robust arrangements and executive support to ensure anti fraud, bribery and corruption measures are embedded throughout the Council.	The Council has in place an Anti-Fraud and Corruption Strategy & Fraud Response Plan and associated policies to deter, prevent, investigate acts of fraud or corruption.	Executive Director (Finance and Transformation)
		The Councils Audit Committee will receive reports during the year about the arrangements in place to protect the Council against fraud.	Executive Director (Finance and Transformation) /Head of SAFS
		The Audit Committee Chairman, along with the senior management team, will ensure compliance with the latest best practice in the Councils anti-fraud arrangements.	AC Chairman/ Executive Director (Finance and Transformation) / Monitoring Officer
		Weaknesses revealed by instances of proven fraud will be fed back to departments with recommendations to 'fraud-proof' systems, and inform future internal audit planning.	Head of SAFS/ Head of SIAS
		The Council will publish its Fraud Data in compliance with the Transparency Code.	Head of SAFS
		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.	Monitoring Officer / Human Resources and Organisational Development Manager
ACKNOWLEDGE	Accessing and under-standing fraud risks.  Committing the right support  Demonstrating a robust anti-fraud response.  Communicating risks	Inclusion of Fraud Risks and actions to manage/mitigate/reduce this in its Annual Governance Statement.	Executive Director (Finance and Transformation)
		The Council will publicise anti-fraud campaigns and provide internal communications to staff on fraud awareness/prevention.	Head of SAFS/ Assistant Director (Customer and Transformation)
		The Council will provide fraud awareness & specific anti-fraud training across all Council services and implement E-Learning modules available for staff that is mandatory for all.	Human Resources and Organisational Development Manager / Head of SAFS
		The Council is a member of the Hertfordshire Shared Anti-Fraud Service (SAFS).	Executive Director (Finance and Transformation)
		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 management and SAFS to review.	Head of SIAS
PREVENT	Making the best use of information and technology.  Enhancing fraud controls and processes.  Developing an effective anti-fraud culture.  Communicating activity and successes.	SAFS will provide fraud alerts and new/emerging fraud threats to be disseminated to appropriate officers/staff/services.	Head of SAFS
		SAFS will work with all Council services to make best use of 3rd party providers such as NAFN, PNLD, CIPFA, CIFAS.	Head of SAFS
		Maintain and improve the Councils use of the Herts <i>FraudHub</i> and support Council officers with the output from NFI 2024/25 Exercise	Head of SAFS/ Executive Director (Finance and Transformation)
		The Council will 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.	Head of SAFS/ Executive Director (Finance and Transformation)
		SAFS will provide reports to the SAFS Board quarterly on anti-fraud activity across the Partnership and any learning to be shared across all Partners.	Head of SAFS
		The Council will review data sharing agreements/protocols to ensure compliance with DEA & GDPR/DPA to maximise the benefits of sharing data with others to help prevent/identify fraud.	Monitoring Officer and the Data Protection Officer
		SAFS will work with the LGA and Cabinet Office to support the work of the Public Sector Fraud Authority.	Head of SAFS
PURSUE	Prioritising recovery and use of sanctions.  Developing capability and capacity.  Collaborating across boundaries.  Learning lessons, closing the gaps.	All fraud reported to the Council will be via SAFS fraud reporting tools (web/phone/email) for staff, public and elected Members. SAFS will work with officers to promote the reporting of suspected fraud.	Head of SAFS
		All investigations will comply with relevant legislation and Council policies. Investigations will include civil, criminal and disciplinary outcomes.	Head of SAFS
		SAFS will use its case management system to record and report on all fraud referred, investigated and identified.	Head of SAFS
		Legal services, HR and debt recovery teams will seek to 'prosecute' offenders, apply sanctions and recover financial losses- supported by relevant policies.	Monitoring Officer/ Human Resources and Organisational Development Manager/ Executive
		SAFS and the Councils Shared R&B Service will work with DWP to deliver joint investigations where fraud affects both HB and CTax.	Head of SAFS/ Revenues and Benefits Client Manager
		All SAFS staff will be fully trained and accredited. SAFS will continue to work with the Cabinet Office to support the Counter-Fraud Profession.	Head of SAFS
		SAFS will use its in-house expertise as well as external partners when considering the use of POCA, Surveillance or IT Forensics.	Head of SAFS
PROTECT	Recognising the harm that fraud can cause in the community.  Protecting the Council and its residents from fraud.	SAFS will provide reports and data to Fraud Champions on all anti-fraud activity as required.	Head of SAFS
		Reports for Audit Committee on all Counter Fraud activity at the Council 3 times in 2025-2026	Head of SAFS / Executive Director (Finance and Transformation)
		The Council has in place measures to protect itself against cyber crime, malware and other pontental attacks aimed at its IT infrastructure, with training for staff and elected members	Assistant Director (ICT and Digital)
		SAFS will work with bodies including MHCLG/LGA/CIPFA/FFLB to develop anti-fraud strategies at a national level that support fraud prevention in local government	Head of SAFS



## Appendix B.

### SAFS KPIs - 2025/ 2026 (WHBC)

KPI	Measure	Objectives	Reason for KPI
1	Return on investment from SAFS Partnership.	Demonstrate that the Council is receiving a financial return on investment from membership of SAFS and that this equates to its financial contribution. A. Meetings to take place with the Councils S.151, quarterly. B. S.151 or deputy will attend the quarterly meeting of the SAFS Board.	Transparent evidence to Senior Management that the Council is receiving a service matching its contribution.
2	Provide an investigation service.	A. <b>Target to deliver at least 95% of the funded 409 Days</b> of counter fraud activity including proactive and reactive investigations, data-analytics, staff training and fraud risk management. (Supported by SAFS Intel/Management). B. 3 Reports to Audit & Governance Committee.	Ensure ongoing effectiveness and resilience of the Councils anti-fraud arrangements.
3	Action on reported fraud.	A. All referrals into SAFS to be reviewed within <b>2 working days</b> .	Ensure that all cases of reported fraud are triaged within agreed timescales.
4	Added value of SAFS membership.	A. Membership of NAFN & PNLD B. Membership of CIFAS/LBFIG/FAP/FFCL C. NAFN Access/Training for relevant Council Staff D. 10 Training events for staff/Members in year.	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 officers by type & source. B. All cases investigated will be recorded and the financial value, including loss/recovery/ savings of each will be reported to Council officers. C. 6-12 Social homes secured from unlawful use or sub-letting. D. 100% Review of all Right to Buy and 'Succession' applications.	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 output from NFI 2025/26 Council services. B. Maintain use of the Herts FraudHub	Build a data hub that will allow the Council to access and share data to assist in the prevention/detection of fraud.