

<b>Committee(s)</b>	<b>Dated:</b>
Audit and Risk Management Committee	06/11/2018
<b>Subject:</b> London Counter Fraud Hub - Onboarding	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For Decision</b>

### **Summary**

The London Counter Fraud Hub (LCFH) is a pan-London data-matching solution that uses data provided by local authorities and from other sources, along with advanced analytics to increase the detection and prevention of fraud across London, and to create opportunities for cross-boundary co-operation to reduce fraud.

The current cost model upon which the LCFH primarily works is on a payment by results basis; however, we understand that CIPFA are currently considering implementing a subscription model as an alternative, which is being monitored by Internal Audit.

The upfront costs of onboarding to the hub are expected to be limited to internal system developments for data extraction and automation to deal with referrals as appropriate.

The LCFH is designed to complement, not replace, current methods for detecting and preventing fraud, or to replace the City's participation in the National Fraud Initiative exercise.

The Comptroller and City Solicitor has advised that there is no major legal impediment to the City of London signing the Deed of Adherence and becoming a "Participating Authority" to the Services Agreement between the London Borough of Ealing and CIPFA Business Limited.

On-going internal consultation with the Revenues, Housing, Insurance and Legal teams continues to ensure that the City is fully prepared for the LCFH.

The City of London is aiming to on-board to the LCFH in January 2019, subject to the proof of concept phase being completed and signed-off.

### **Recommendation(s)**

- It is recommended that Members delegate authority to the Chamberlain to sign the Deed of Adherence with the London Borough of Ealing for the City of London to onboard to the London Counter Fraud Hub.

### **Main Report**

#### **Background**

1. The London Counter Fraud Hub (LCFH), is a pan-London data-matching solution that uses data provided by local authorities and from other sources, along with advanced analytics to increase the detection and prevention of

fraud across London, and to create opportunities for cross-boundary co-operation to reduce fraud.

2. In October 2015, the City of London signed a Memorandum of Understanding, along with the 32 London Boroughs, demonstrating London's commitment to using the Hub.
3. Members were advised of the City's progress in preparing for the LCFH in our Anti-Fraud & Investigations Annual report to this Committee on 29<sup>h</sup> May 2018.
4. The London Borough of Ealing are the lead authority for the LCFH and in 2015 launched a competitive dialogue procurement procedure in accordance with the Public Contracts Regulations 2015 (as amended) (PCR 2015).
5. Regulation 38 of the PCR 2015 permits contracting authorities such as Ealing Council to jointly procure services in its own right and on behalf of other named contracting authorities.
6. Following the conclusion of a competitive dialogue procurement procedure in 2016, CIPFA Business Ltd were awarded a contract to develop and provide the LCFH data-matching solution, along with their partner, BAE Systems.
7. The initial datasets that the City would be expected to provide to the LCFH are Council Tax, Business Rates and Housing Tenancy; it is expected that further datasets will be added as the LCFH matures.

### **Current Position**

8. Four pilot authorities, the London Boroughs of Ealing, Croydon, Camden and Islington have been working with CIPFA over the past 18 months to test the LCFH and develop the proof of concept. The proof of concept phase is nearing completion when we expect the results to be shared with the City of London and other London Boroughs.
9. CIPFA are currently developing a timeframe for London Boroughs to on-board to the LCFH. At this point, the City is aiming to on-board to the LCFH, subject to the proof of concept phase being completed and signed-off, in January 2019.
10. On-boarding to the LCFH is undertaken via a Deed of Adherence with the London Borough of Ealing.
11. As part of our preparations for on-boarding to the LCFH, we are working with colleagues in the Revenues and Housing teams to ensure that data in the specified format can be extracted from our internal data-bases and provided to CIPFA for the purposes of data-matching. Likewise, we have been consulting with colleagues in the Information Team, Insurance Team, and the Comptroller and City Solicitors Department.
12. Resources will be reviewed periodically as the City's participation in the LCFH develops, and appropriate steps will be taken as necessary.

13. The LCFH is designed to complement, not replace, current methods for detecting and preventing fraud, or to replace the City's participation in the National Fraud Initiative exercise.

### **Cost Implications**

14. The current cost model upon which the LCFH primarily works is on a payment by results basis; however, we understand that this model is currently under review by CIPFA, and that consideration is being given to implementing a subscription model as an alternative, this will be monitored by Internal Audit and cost implications reviewed.
15. Some up-front on-boarding costs are likely to be necessary to develop, for example, in-house systems to enable the City to provide data in the required format, and to develop automation where appropriate.

### **Data Protection & Legal Position**

16. A data privacy impact assessment has been completed and agreed with the City's Information Team; likewise, the LCFH has been listed on our Record of Processing Activities.
17. The contract documents for the LCFH have been reviewed by the Comptroller & City Solicitor, who advise that there is no major legal impediment to the City of London signing the Deed of Adherence and becoming a "Participating Authority" to the Services Agreement between the London Borough of Ealing and CIPFA Business Limited.
18. A small number of queries surrounding insurance indemnities and data retention periods are being worked on with the City's Insurance Team and the London Borough of Ealing respectively. We expect these to be resolved prior to the City on-boarding to the LCFH.

### **Proposal**

19. It is proposed that the Chamberlain is given delegated authority to sign the Deed of Adherence on behalf of the City of London, enabling the City to on-board to the LCFH in January 2019, subject to the proof of concept phase being completed and signed-off.
20. The LCFH has been designed to be a sophisticated tool to assist in the prevention and detection of fraud and is expected identify fraud in local Government across London, whilst also enabling authorities to prevent fraud at point of access by verifying application data. The success of the LCFH is dependent on London Borough's and the City of London on-boarding to the Hub.
21. Should the City not sign-up to the LCFH, we risk not identifying fraud that may otherwise have been identified through participation in the LCFH.

## Corporate & Strategic Implications

22. The City of London is committed to tackling fraud across the services that it provides as set-out in its Anti-Fraud & Corruption Strategy. It is anticipated that the LCFH will be a valuable tool in detecting fraud that may otherwise have gone undetected.
23. Participation in the LCFH to tackle pan-London fraud aligns to a primary objective in the City of London's Corporate Plan - to contribute to a flourishing society by tackling terrorism, violent and acquisitive crime, **fraud**, cyber-crime and anti-social behaviour and facilitate justice.

## Conclusion

24. The LCFH will provide an additional tool in the fight against fraud across London by providing a sophisticated data-matching tool to the City of London and other London Borough's, which is designed to identify in-boundary, and cross-boundary fraud that may otherwise go undetected by current and traditional anti-fraud and investigation activities.
25. The current cost model upon which the LCFH primarily works is on a payment by results basis, however we understand that CIPFA are currently considering implementing a subscription model as an alternative; this is being monitored by Internal Audit.
26. Internal consultation continues with the Revenues, Housing, Insurance and Legal Teams, to ensure that the City is ready for on-boarding in January 2019, subject to the proof of concept phase being completed and signed-off.
27. The Comptroller & City Solicitor has advised that there is no major legal impediment to the City of London signing the Deed of Adherence to join the LCFH.

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