



Northern Ireland Audit Office

The National Fraud Initiative: Northern Ireland

REPORT BY THE COMPTROLLER AND AUDITOR GENERAL
26 June 2012



Northern Ireland Audit Office

Report by the Comptroller and Auditor General for Northern Ireland

The National Fraud Initiative: Northern Ireland

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K.J. Donnelly
Comptroller and Auditor General

Northern Ireland Audit Office
26 June 2012

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Foreword

Fraud is an ever present threat. It continues to rob the public purse of vital funds needed for the provision of goods and services. Fighting fraud must take on a new urgency in the current economic climate. Every public sector body has a duty to demonstrate a zero tolerance to fraud and to play its role in thwarting fraudsters.

Under statutory powers inserted in the Audit and Accountability (Northern Ireland) Order 2003 by the Serious Crime Act 2007, I am able to undertake data matching exercises for the purpose of assisting the prevention and detection of fraud. These powers have strengthened considerably the hand of the public sector to combat fraud. It is important that public bodies embrace this tool, make it an intrinsic part of their counter fraud strategy and embed it into their core business. This will enable them to be more enterprising in realising the full potential of data matching.

This is the second National Fraud Initiative (NFI) exercise to be undertaken in Northern Ireland. **I would particularly like to commend those public bodies who have participated in the NFI and the significant efforts of all public servants who have been involved in the review and investigation of data matches.** The results clearly demonstrate the value of data matching as an effective counter fraud tool. This is good news at a time when public resources are particularly stretched. Public bodies are encouraged to spend to save and to recognise the contribution that their participation in the NFI can make to the interests of Northern Ireland as a whole.

The Assembly's Public Accounts Committee has stated its support for the NFI and called upon everyone involved to play their respective roles in taking it forward. It views the NFI as **"a key tool in the armoury against fraud and error"**.

All those involved in the first exercise in 2008-09 now have a greater understanding of the NFI and its potential. In order to maximise that potential, I am keen to further develop and widen our involvement in the National Fraud Initiative and would welcome suggestions from both public and private sector bodies for further potential data matches that could help in the prevention and detection of fraud.

Kieran Donnelly

Comptroller and Auditor General

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Abbreviations

BBIS	Blue Badge Improvement Scheme
C&AG	Comptroller and Auditor General
CPD	Central Procurement Directorate
DFP	Department of Finance and Personnel
DRD	Department for Regional Development
LPS	Land and Property Services
NFI	National Fraud Initiative
NIAO	Northern Ireland Audit Office
NIHE	Northern Ireland Housing Executive
NILGOSC	Northern Ireland Local Government Officers' Superannuation Committee
SSA	Social Security Agency
UK	United Kingdom

Executive Summary

1. The National Fraud Initiative (NFI) is a major data matching exercise that is undertaken every two years and which enables public audit agencies in the UK to participate in cross jurisdictional data matching for the purposes of identifying fraud and error. NFI 2010-11 is the second exercise to be undertaken in Northern Ireland.
2. One hundred and seven bodies participated in NFI 2010-11, including central government bodies, agencies, non departmental public bodies, local councils and health sector bodies. This is an increase from NFI 2008-09, when 74 bodies participated.
3. Bodies must be commended for the significant work they put into the preparation of data for matching and the investigation work they carry out on the matches they receive.
4. Participants were asked to provide certain data sets for matching. These included payroll, pensions, trade creditors, housing benefit, blue badges, concessionary travel passes, taxi driver licenses, private supported care home residents and domestic rates.
5. The NFI uses a sophisticated computerised data matching system, developed by the Audit Commission, to compare sets of data against other data sets held by the same, or another, body, in order to highlight matches which could indicate that fraud or error exists. Reports of data matches are made available to participating bodies via a secure website.
6. The majority of matches for NFI 2010-11 were issued to participating bodies in late January 2011, for follow up and investigation in accordance with guidance from the Northern Ireland Audit Office (NIAO) and in line with bodies' own assessments of their fraud risk and knowledge of their key business areas.
7. The latest results continue to show the potential of data matching to protect the public purse against fraud. Total NFI outcomes¹ in Northern Ireland since 2008-09 are just over £24 million. Between 1 April 2010 and 31 March 2012, Northern Ireland's participation in NFI resulted in outcomes of £20.8 million, including:
 - over £13 million of rates evasion and rate relief overpayments;
 - over £5 million of housing benefit fraud and overpayments; and
 - over £2 million of pensions fraud and overpayments.
8. The outcomes figure of £20.8 million comprises actual savings of £15.3 million and estimated savings of £5.5 million (see footnote 1). Key findings are at Figure 1.
9. The benefits derived from the NFI are both quantitative, for example the identification and recovery of overpayments made as a result of fraud or error, and qualitative, for example the cleansing of data sets² leaving bodies less vulnerable to fraud.

1 Outcomes include the value of incorrect payments (due to fraud or error) which are stopped, and an estimate of future savings achieved by no longer making these incorrect payments.

2 Data matches can highlight duplication or inconsistencies in data records which need to be corrected or "cleansed".

Executive Summary

10. NIAO audit staff have monitored the progress of participating bodies in relation to the NFI, through discussion with relevant personnel and review of data match reports on the secure website. Key points arising from this monitoring work include:
- **the NFI needs to be further embedded into the core business practices and counter fraud strategies of bodies. A number of bodies do not even refer to the NFI in their counter-fraud policies;**
 - **a significant number of bodies appear to be over investigating. There is no requirement to investigate every data match. Bodies' strategies for investigation should be based on an assessment of fraud risk within the relevant data sets. Investigations should focus on areas of greatest risk; and**
 - **arrangements should be made to cover for key personnel when they are on extended leave. There were examples of bodies where the key contact for the NFI had been off for some months and, as a result, work had not progressed because no-one had taken over their role.**
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Figure 1: NFI Key Findings

Housing Benefit

- Outcomes of over £5 million since 1 April 2010
- 333 cases of suspected fraud uncovered so far in 2010-11 matches

Domestic Rates

- Outcomes of over £13 million since 1 April 2010
- 489 cases of suspected rates evasion uncovered so far in 2010-11 matches

Pension Payments

- Outcomes of over £2 million since 12 April 2010
- Over 40 cases of error identified so far in matching 2010-11 pension records with death records

Trade Creditors

- Outcomes of over £386,000 since 1 April 2010, representing overpayments to suppliers on which recovery is being, or has been, sought
- Over 500 cases of error identified so far in 2010-11 matches. These represent duplicate payments and overpayments

Blue Badges and Travel Passes

- Over 7,000 matches between blue badges holders and deceased persons in Northern Ireland, of which 202 have been investigated, with 141 badges cancelled
- Over 15,000 matches between concessionary travel pass holders and deceased persons. By 31 March 2012, over 14,000 of these passes had been cancelled

Part One:
NFI Outcomes

Part One: NFI Outcomes

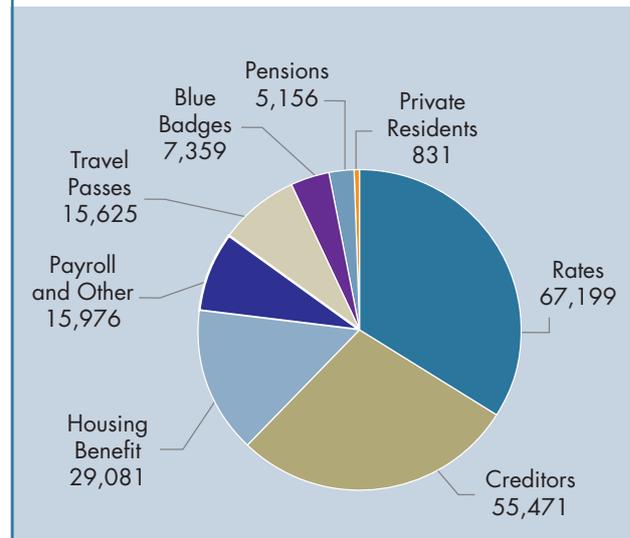
Background

- 1.1 The National Fraud Initiative (NFI) is a major data matching exercise that is undertaken every two years and which enables public audit agencies in the UK to participate in cross jurisdictional data matching for the purposes of identifying fraud and error (see Appendix 1 for more details about the NFI).
- 1.2 NFI 2010-11 is the second exercise in Northern Ireland. Outcomes continue to show the value of the NFI as a counter fraud tool.

Data Matches

- 1.3 Data sets from 107 bodies (see Appendix 2) were matched as part of NFI 2010-11. Almost 197,000 matches were identified, of which around 36,000, or 18 per cent, were categorized as recommended filter matches (see paragraph 1.5). Figure 2 shows the number of matches by data set.
- 1.4 Over 109,000 matches (55 per cent) had been processed by 31 March 2012. Of the 36,000 recommended filter matches, 60 per cent had been processed by the same date.
- 1.5 Recommended filter matches are the highest priority matches and should ideally be investigated as a minimum. However, bodies may reprioritise matches based on their known risks (see Appendix 1, paragraph 9). Bodies must ensure that their strategy for prioritizing and investigating matches is based on a robust

Figure 2: Number of 2010-11 Data Matches



risk analysis (see paragraph 2.6).

Outcomes Summary

- 1.6 Between 1 April 2010 and 31 March 2012, Northern Ireland bodies identified outcomes³ of £20.8 million. This figure is made up of late savings from the 2008-09 exercise of £15.7 million and £5.1 million of outcomes to date from the 2010-11 exercise.⁴ A table showing total NFI outcomes to date in Northern Ireland, and a full explanation of figures used in this report, is at Appendix 4.
- 1.7 Based on information recorded by participating bodies on the secure website for 2010-11 matches, the overall recovery rate for overpayments is 71 per cent. This compares favourably with a national average of 62 per cent.

3 The outcomes include both actual and estimated figures for fraud detections, overpayments and additional revenue. Estimates are included where it is reasonable to assume that fraud and overpayments would have continued undetected without NFI data matching. The basis of calculation of these estimated figures is set out at Appendix 3.

4 The Audit Commission reports every two years on outcomes at the relevant 31 March. This report now uses the same basis for Northern Ireland. A full explanation is at Appendix 4.

- 1.8 The outcomes achieved through data matching compare with a cost of £254,000 for running the 2010-11 exercise, which NIAO recovered by charging fees to participating bodies. This cost does not include participants' own costs, such as staff time spent investigating matches. We recognise that, for some organisations, this can be a significant investment of resources.
- 1.9 Inevitably, some participating bodies achieve greater quantifiable outcomes from the NFI than others, and bodies with few outcomes may question the value of the exercise to them. However, bodies that receive few matches, or find no fraud or error in the matches they investigate, can take assurance that their control environment appears to be working as it should be.
- 1.10 Participating bodies were advised by NIAO to maintain a record of resources devoted to NFI investigations, particularly if they wished to make a case that participation in the NFI was too onerous for them. Only 19 bodies indicated to NIAO that they keep such a record but none has made a case to NIAO for exclusion.
- 1.11 When the costs and benefits of the NFI are considered in regional terms, the value of the initiative in fighting fraud is unquestionable.
- 1.12 At the time of our last report, investigations were on-going and court proceedings pending in relation to a number of suspected fraud cases detected through

the first NFI exercise. The case examples below highlight some successful and significant prosecutions:

Case Example 1

A person was claiming a range of benefits while employed in a public sector body. Overpayments amounted to £49,000 over a six year period. They were sentenced to two years imprisonment, suspended for three years. The person is no longer in receipt of benefits and a recovery plan has been entered into.

Source: Social Security Agency

Case Example 2

An employee of a participating body over-claimed incapacity benefit in excess of £30,000 over an eleven year period before the fraud was detected through NFI. Prosecution was not pursued for medical reasons. No recovery has been made to date but it is intended that this will commence soon.

Source: Social Security Agency

Part One: NFI Outcomes

Case Example 3

An employee of a participating body, who was claiming benefits while working, was sentenced to 100 hours community service for fraudulent overpayments of income support, job seeker's allowance and housing benefit, amounting to £73,000 over a nine year period. The person is no longer on benefits. A recovery plan is ongoing.

Source: Social Security Agency

- 1.13 These case examples show very clearly the ability of the NFI to detect long-standing frauds which may not have been detected in any other way. Publicity surrounding such cases also acts as a deterrent to other potential fraudsters.
- 1.14 Under NFI guidance⁵, where successful prosecutions are secured, the employing body of the fraudster should be notified so that disciplinary proceedings can be considered. NIAO has recently become aware that this has not been happening in Northern Ireland. It is essential that such notifications happen so that the deterrent effect of the NFI can be reinforced.
- 1.15 This issue has been discussed with the Department of Finance and Personnel (DFP), which is responsible for issuing counter fraud guidance to the Northern Ireland public sector. DFP told us that it accepts the overall principle of notifying employing bodies and is currently considering this issue in the context of wider counter fraud arrangements.
- 1.16 The remainder of this section sets out the latest key findings in more detail.
- ### Housing Benefit
- 1.17 People on low incomes may receive assistance with their rent and/or rates through the payment of housing benefit and/or the granting of rate relief. Fraud and error can occur when housing benefit and rate relief entitlement are calculated on the basis of inaccurate information. This can happen, for example, where:
- the claimant does not declare a source of income; or
 - the claimant does not declare all residents at the address.
- 1.18 The Northern Ireland Housing Executive (NIHE) administers housing benefit and rate relief schemes for those who rent their homes. Land and Property Services (LPS) administers housing benefit and rate relief schemes for those who own and occupy their own homes.
- 1.19 Many people have an automatic entitlement to housing benefit because they are in receipt of what is termed a "passported benefit"⁶. NFI matches which expose problems with housing benefit entitlement can also expose fraud and overpayments in relation to these other benefits. These matches are of interest to the Social Security Agency (SSA) which administers the other benefits.

5 Guidance on this is embedded in the NFI web application (see Appendix 1), where pop-up boxes for each type of match explain the purpose of the match and how investigations should be approached and their outcomes reported.

6 Claimants in receipt of specified benefits (such as income support or job seeker's allowance), administered by the Social Security Agency, are automatically entitled to housing benefit. These specified benefits are referred to as passported benefits.

- 1.20 Investigation of NFI matches in relation to housing benefit may be undertaken by NIHE, LPS or SSA depending on the circumstances of the case. Protocols are in place for the referral of cases between these bodies.
- 1.21 NIHE Housing Benefit matches which, on preliminary investigation, appear to be fraudulent, are passed to SSA for investigation. SSA has been diligent and thorough in its investigations of the matches, leading to successful prosecutions. The investigation of suspected fraud cases is a protracted process so it is important that SSA adequately resources its investigation teams, to ensure that all NFI suspected fraud matches are investigated. This point has previously been made by the Public Accounts Committee.⁷
- 1.22 Under the NFI, housing benefit records are matched against a range of other data sets including public sector payroll and pensions, student loans and housing tenancies.
- 1.23 Over 29,000 housing benefit matches were identified in NFI 2010-11, of which almost 7,000 have been investigated so far, with 333 cases of suspected fraud uncovered. Total housing benefit outcomes in the period 1 April 2010 to 31 March 2012 were just over £5 million. This figure includes other benefits in “passported” cases.

Case Example 4

A person employed in the public sector was working while claiming benefits. Overpayments of income support, job seeker’s allowance and housing benefit totalled over £19,000. The person was prosecuted and sentenced to 18 months in prison, suspended for three years. The person is no longer on benefits and has entered into a recovery plan.

Source: Social Security Agency

Case Example 5

A data match between housing benefit and pensions revealed that a man had failed to declare an occupational pension, resulting in overpayment of housing benefit between 2003 and 2011, amounting to £25,000. He was given a three year conditional discharge. Recovery is being pursued by NIHE.

Source: Social Security Agency

Case Example 6

A home owner on housing benefit (via a passported benefit) failed to declare a partner living at the same address. This was picked up by a data match to payroll, as the partner worked for a public sector body. The claimant had also returned to work and had failed to notify the change of circumstances. An overpayment of just over £12,000 was raised and the money is being recovered.

Source: LPS

Part One: NFI Outcomes

Case Example 7

A home owner on housing benefit had become entitled to an occupational pension in 2005 but had not declared this income to Land and Property Services. An overpayment was raised amounting to almost £3,700. The money is being recovered.

Source: LPS

had been processed and 489 cases of rates evasion had been detected.

- 1.28 For the period 1 April 2010 to 31 March 2012, outcomes for rates matches totalled £13.2 million.

Case Example 8

A property was registered for rates from April 2009 but NFI data matching showed that the property was occupied for the two years prior to this. Outstanding rates of £8,050 are due and the ratepayer has entered into an agreement to clear the outstanding debt.

Source: LPS

Avoidance of Domestic Rates

- 1.24 Domestic rates are a property tax based on the valuation of a residential property and payable by the occupier. Rates are administered by LPS (see paragraph 1.18).
- 1.25 Prior to October 2011, in the period covered by NFI 2010-11, domestic rates were only payable if a property was occupied. Payment of domestic rates could therefore be avoided by:
- not notifying LPS that rates should be paid; or
 - registering the property as void or unoccupied for rating purposes.
- 1.26 Under NFI 2010-11, the electoral register was matched with domestic properties registered for rates, to identify cases where occupiers were potentially seeking to avoid paying domestic rates.
- 1.27 Over 67,000 matches were generated. By 31 March 2012, 47,460 matches

Case Example 9

A rental property was registered as vacant but NFI data matching showed it had been occupied from April 2007. The landlord has now provided full details of periods of occupation and a rate account for over £6,000 arrears has been issued.

Source: LPS

Occupational Pensions

- 1.29 Six occupational pension paying bodies in the public sector⁸ submitted data sets for matching, to help identify suspected fraudulent or erroneous pension payments. Examples of ways in which pension fraud and error may happen include:

⁸ Northern Ireland Civil Service Pensions, NI Local Government Officers' Superannuation Committee (NILGOSC), Teachers' Pensions, Health Pensions, NI Fire and Rescue Service Pensions and Assembly Pensions.

- pensions may continue in payment after the pensioner has died because the pension paying body was not notified of the death; and
- a pensioner may avoid a pension reduction by returning to work but failing to inform the pension paying body.

Deceased Pensioners

- 1.30 NFI matched occupational pension records to death records and generated 1,576 matches for investigation. Almost 1,200 of these have been investigated so far, with 37 cases of error identified.
- 1.31 Outcomes for the period 1 April 2010 to 31 March 2012 in relation to deceased pensioners amounted to just over £2 million.

Case Example 10

A local government pensioner died in November 2008 but the pension paying body was not aware of this until it received its data matches in January 2011. The resulting overpayment was almost £11,000. The money was recovered in full from the deceased's bank account.

Source: NILGOSC

Case Example 11

A local government pensioner died in June 2009 but payments continued until an NFI data match made the pension paying body aware of the death. The overpayment of almost £12,000 was recovered in full.

Source: NILGOSC

Case Example 12

A pensioner in receipt of a health service pension died in January 2010. This only came to light following a data match and payments were stopped in August 2011. The surviving spouse was not aware that entitlement ceased on death. The resulting overpayment of almost £4,500 has been recovered in full.

Source: Business Services Organisation

Pensioners returning to work

- 1.32 Pension records were matched to payroll records, with a match indicating that a pensioner may have returned to work and abatement of pension may be required. This generated 3,580 matches, of which 3,250 had been investigated by 31 March 2012. Five errors were identified. Outcomes for the period 1 April 2010 to 31 March 2012 in relation to pension abatements amounted to almost £83,000.

Part One: NFI Outcomes

Payroll

1.33 The NFI matches payroll data across a wide range of UK public sector bodies, and with UK Border Agency information, to identify cases of employment fraud, for example:

- employees with two full-time jobs;
- employees working for one body while on long-term sick leave from another;
- employees with two jobs where shift patterns overlap, so that it would not be possible to cover both jobs; and
- employees with no entitlement to live or work in the UK.

1.34 Almost 16,000 payroll matches were received as a result of the 2010-11 data matching exercise and 50 per cent of these have been investigated. Thirty one errors and three frauds have been identified so far. Outcomes for payroll matches for the period 1 April 2010 to 31 March 2012 amount to almost £6,000.

Trade Creditors

1.35 The NFI examines creditors' data within organisations to help identify duplicate payments and incorrect VAT calculations.

1.36 Matching of creditors' standing data and payments history generated just over 55,000 matches, of which just over

27,000 have been investigated and 531 errors identified. The number of matches is similar to the previous exercise which suggests there is still work to be done in improving the quality of records held, by cancelling or updating records.

1.37 Creditors' outcomes of £386,000 have been identified for the period 1 April 2010 to 31 March 2012 and recovery action is ongoing. Examples of outcomes include:

- one education and library board had 139 errors amounting to £70,491;
- one health trust identified a duplicate payment of £29,900;
- one local council identified six duplicate payments amounting to £27,615;
- another local council identified one duplicate payment of almost £12,000; and
- one department identified a duplicate payment of almost £7,000.

Concessionary Travel Passes

1.38 Concessionary travel is available to people aged 60 or over for travel within Northern Ireland, aged 65 and over for All Ireland Free Travel, and to others with certain mobility or medical issues (half fare). The issue of concessionary travel passes is administered by Translink.⁹

⁹ Translink is the name under which the bus and rail companies operate. Its parent company is the Northern Ireland Transport Holding Company, which is an Arm's Length Body of the Department for Regional Development.

- 1.39 This is the first time that concessionary travel passes have been included in NFI data matching. Details of pass holders were matched with death records to identify cases where a pass was still in circulation, and could therefore potentially be used, after the death of the pass holder. Over 15,500 matches were produced.
- 1.40 Translink has been proactive in dealing with these matches. An initial review identified 88 passes which had been fraudulently used after the date of death. These were cancelled in June 2011 to prevent further usage. By 31 March 2012, a further 14,206 passes, which had not been used after the date of death, had been deactivated. Work is on-going to cancel the remaining passes.

Blue Badges

- 1.41 Blue badges can be applied for by people with severe mobility problems. They entitle the holder to a range of parking concessions, for example, free parking at on-street 'pay and display' equipment and use of parking spaces reserved exclusively for blue badge holders. The blue badge scheme in Northern Ireland has been administered by the Department for Regional Development's Roads Service.¹⁰ Currently, around 104,000 blue badges are in issue in Northern Ireland. Badges are valid for three years and around 30,000 are renewed each year.
- 1.42 The main risk in relation to blue badges is that the badge is used by someone other than the named badge holder, to avoid parking costs or for easy parking. This potentially denies parking spaces to genuine blue badge holders. The National Fraud Authority estimates that around 20 per cent of all badges in circulation are being misused in some way, with losses estimated at £46 million a year in England.¹¹ An additional risk is that stolen or counterfeit blue badges can be sold for significant sums on the black market.
- 1.43 The Department for Transport is currently reforming the blue badge scheme in an effort to tackle the level of fraud. The Blue Badge Improvement Scheme (BBIS) is being phased in over the next three years and aims to tackle fraud through a central database of badge holders which will facilitate verification checks, and a new badge design that is harder to copy, forge or alter.
- 1.44 On the application of the blue badge reforms to Northern Ireland, the Department for Regional Development (DRD) told us that it is currently considering the BBIS reforms. Although it already operates an independent database of badge holders in Northern Ireland, it is keen to adopt the new badge design to further assist in its efforts to tackle the misuse of blue badges.
- 1.45 Under the NFI, information on blue badge holders is matched to death records to identify badges potentially still in use

10 From April 2012, Roads Service has been de-agentised and brought back within the Department.

11 Annual Fraud Indicator, National Fraud Authority, March 2012

Part One: NFI Outcomes

- after the death of the registered owner. This generated 7,319 matches, of which 6,198 were recommended filter matches (see paragraph 1.5). At March 2012, Roads Services' web application showed that it had investigated 157 cases, but no frauds or errors were recorded. Roads Service told us that it has cancelled 141 of these badges. In the other 16 cases, poor quality data in Roads Service resulted in a false match being generated.
- 1.46 In addition, based on an assessment of risk, Roads Service investigated all data matches where the blue badge commencement date was more than 15 days after the date of death. Of the 45 cases identified, two cases of suspected fraud were confirmed and have been referred to the police.
- 1.47 DRD needs to undertake significant work on its blue badge data set to cleanse the data. One example of data quality issues relates to cases where widows with the same initial as their deceased husbands have obtained a blue badge, using their deceased husbands' national insurance number on the application form, thereby generating a match with death records. In NIAO's view, these cases should be recorded as errors, the badges cancelled and then properly reissued, if appropriate, with the full details of the applicant. DRD disagrees and believes that the use of an incorrect national insurance number in these cases does not invalidate the badge, as it has been issued appropriately.
- 1.48 The false matches generated by inaccurate data highlight the need to ensure that the fullest possible details are obtained from applicants, for example full names instead of initials, and correct national insurance numbers. DRD told us it aims to ensure that accurate data is maintained as blue badge applications are processed going forward.
- 1.49 The Audit Commission calculates potential savings arising from the cancellation of blue badges on the basis of a badge's value on the black market, estimated to be £500. Using the Audit Commission's methodology, cancellation of the 7,319 badges could lead to potential savings of £3,659,500. DRD told us that it does not agree with this methodology because it assumes that all blue badges which remain uncanceled after the death of the holder have been sold on the black market. It believes this is highly unlikely and also disrespectful to the close relatives of the deceased. A more likely explanation is that the badges have simply not been returned for cancellation. DRD told us that other controls are in place to detect the illegal use of blue badges, including a dedicated blue badge enforcement patrol.
- 1.50 Roads Service carried out an exercise to calculate the potential loss of parking revenue due to the misuse of deceased persons' badges. This was based on parking charges in Belfast and on the fact that around seven per cent of total badges in circulation have been highlighted by the NFI as being in the name of deceased persons.
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This exercise resulted in an estimated maximum annual loss of parking revenue of £70,000.

- 1.51 NIAO notes the work undertaken to date by Roads Service on developing a methodology for calculating potential savings from preventing the misuse of deceased persons' blue badges. We consider that the NFI should be given a higher priority by Roads Service. Only 202 of the 7,319 data matches have been investigated and significant data quality issues still need to be addressed. DRD told us that it believes the risk of blue badge fraud has been fully embraced and is embedded in its counter fraud strategy, as evidenced by its inclusion in DRD's Fraud Risk Register. It acknowledges the important role of the NFI in that strategy. It also told us its assessment of the risk of blue badge fraud balances the use of resources to undertake NFI data match investigations, the sensitive and time consuming nature of investigations with the relatives of the deceased, the level of loss that is at risk and the benefits of other control measures in place such as the dedicated blue badge enforcement team. To date, however, it has not established an estimate of total losses from the misuse of blue badges.

continue to make payments needlessly. NFI matches information about private care home payments to death records, in order to identify such cases.

- 1.53 The five health trusts received 831 matches and followed up 605. Only one significant error was found where, due to an administrative error, a trust had not been notified of a resident's death. This resulted in overpayments by the Trust of around £4,700. All the money has been reimbursed.

Private Supported Care Home Residents

- 1.52 Health trusts may pay all or part of private care home fees for older people, depending on their circumstances. There is a risk that the Trusts may not be aware of the death of a resident and may

Part Two:
Getting better value from the NFI

Part Two: Getting better value from the NFI

Participating bodies must be commended for their continued commitment to the NFI

- 2.1 NFI 2010-11 is the second exercise in Northern Ireland. For the majority of participating bodies, it was also their second time through the process. However, some were participating for the first time and needed to familiarise themselves with the Initiative and obtain a sound understanding of how it operated.
- 2.2 Participating bodies have continued to devote resources to NFI to ensure its continued success and once again must be commended for their very significant work and commitment.

Participating bodies need to regard the NFI as a fundamental part of their counter fraud arrangements

- 2.3 Participation in the NFI is a requirement for bodies audited by NIAO (see Appendix 2), but with good reason. The NFI is a counter fraud tool. The data matches it generates across a number of key business areas highlight potentially fraudulent transactions and are a valuable source of information for bodies and their auditors in their fight against fraud. The matches therefore form part of the fraud risk of the body and need to be assessed in the same way as any other fraud risk.
- 2.4 Through attendance at Audit Committees and through contact with staff in participating bodies, NIAO audit staff are aware that a number of bodies still regard the NFI as an onerous exercise,

with a significant burden of investigation, imposed by NIAO and of limited value to them. It is still often approached as a stand-alone exercise and not regarded as an integral part of counter fraud work.

- 2.5 Managing Public Money Northern Ireland makes it clear that Accounting Officers are responsible for managing an organisation's risks, including the risk of fraud.¹² The Department of Finance and Personnel (DFP) has published recently a guide for government bodies in Northern Ireland on the management of fraud risk¹³. This highlights the need for a risk-based approach to tackling fraud so that resources can be targeted appropriately. It also endorses the NFI as a "key part of an organisation's fraud strategy".

Participating bodies should adopt a risk-based approach to NFI investigations

- 2.6 Participating bodies are NOT expected to investigate all NFI data matches. Their strategy for investigation should be based on the assessed fraud risks within each business area. To get the most out of investigation, bodies should:
- make use of specialist knowledge of business areas to identify which matches should be followed up;
 - prioritise matches for investigation (the NFI web application highlights recommended matches but bodies can reset NFI filters to suit their own local priorities); and

¹² Managing Public Money Northern Ireland, Annex A.4.7

¹³ Managing the Risk of Fraud: A Guide for Managers, DFP, December 2011

- follow up selected matches promptly to detect fraud and error and put a stop to it at the earliest opportunity.

2.7 A significant number of organisations still appear to be over-investigating. Almost one third of participating organisations investigated 90 per cent or more of their total matches yet found no fraud or error. There is little value in continuing with investigation work if no fraud and error is being found. More targeted investigation of matches should help reduce the perceived burden of the NFI.

The NFI can help to deter fraud

2.8 DFP's fraud risk guide (see paragraph 2.5) highlights the importance of deterrence. It can be achieved through:

- a commitment to combat fraud;
- communication of successful results; and
- pursuit of sanctions and redress.

Commitment to combating fraud

2.9 Commitment to combating fraud is demonstrated through a clear policy statement that fraud will not be tolerated. Participating bodies can use data matching as clear evidence of their zero tolerance to fraud.

2.10 Commitment can also be shown by

making the NFI a key component of any counter fraud strategy and embedding it into the core business practices of the body. This would include, for example:

- reporting NFI results to senior management, Audit Committee etc; and
- using NFI results to address major areas of risk highlighted by data matches.

2.11 Some participating bodies need to do more to embed NFI in their counter fraud arrangements. A number still do not include the NFI as an element of their counter fraud policies. It is seen as a finance exercise, to be reported only on an exceptions basis

Communication of successful results

2.12 DFP's guide emphasizes the importance of targeting potential fraudsters with key messages. By communicating the impact of the NFI both internally and externally, and demonstrating that it is a highly effective tool in the fight against fraud, it becomes a valuable deterrent. Ways of doing this include:

- highlighting successful outcomes in staff newsletters or on participating bodies' intranets;
- including reference to the potency of the NFI on relevant application forms eg for housing benefit; and

Part Two: Getting better value from the NFI

- publicizing successful prosecutions on participating bodies' websites, to demonstrate that fraud will be detected and the fraudster punished.

2.13 Now that a number of successful prosecutions have been secured in relation to frauds uncovered by the NFI (see case examples 1 to 5 in Part One), bodies should publicize these in innovative ways to enhance their deterrent effect.

Pursuit of sanctions and redress

2.14 One of the key deterrent factors in the fight against fraud is having a clear and consistent message that proven fraudsters will be subject to severe sanctions. DFP's guide recommends that the full range of sanctions should be considered – disciplinary action, regulatory action and civil or criminal proceedings.

2.15 In NIAO's view, it is essential that where fraud is proven against a public sector worker through prosecution, this information is shared with the relevant employing authority (see paragraphs 1.14 and 1.15), so that the full range of sanctions can be applied.

2.16 DFP's guidance also highlights the need for a clear policy on the recovery of losses incurred through fraud. The NFI web application provides a facility for recording amounts recovered.

2.17 Paragraph 1.7 highlighted that Northern Ireland has a reported recovery rate

of 71 per cent. It is important that participating bodies maximize recovery and send a strong message to potential fraudsters that they will not gain from their fraudulent activity.

Participating bodies can still make more effective use of the NFI web application

2.18 The NFI web application is designed to streamline the whole process of uploading data, selecting and prioritising matches for investigation, sharing comments with the body on the other side of the match, and recording investigation outcomes and progress on recovery. If used to its full potential, the web application can help minimize the NFI workload for participating bodies.

2.19 Many participating bodies continue to export data matches for investigation onto spreadsheets and work off-line. This should generally be avoided¹⁴ because:

- there is an increased risk of data security breaches when working outside the secure web environment;
- there is no audit trail in relation to the work being undertaken, as it progresses. This limits the oversight role of the Director of Finance and Key Contact¹⁵ for the NFI within the participating body and provides an incomplete picture to auditors reviewing progress;

¹⁴ The one exception is creditors' matches, where exporting to a spreadsheet allows greater manipulation of data to help identify the matches that warrant investigation.

¹⁵ The Director of Finance and designated Key Contact are two key roles in ensuring the successful operation of the NFI within an organization. The designated Key Contact would usually be within the finance or audit function.

- the sharing of comments and enquiries with the body on the other side of the match is less streamlined if it happens outside the web application;
- working off-line necessitates the later upload of comments and outcomes onto the web application, which is a duplication of effort and adds to the overall workload; and
- working off-line increases the risk that outcomes will not be recorded fully on the web application and will therefore be under-reported.

2.20 A number of bodies explained to NIAO that, for data security reasons, they exported selected data matches to designated investigating staff, rather than giving those staff access to all the data matches on the web application. However, the Key Contact can give investigating staff access only to the match reports they are required to investigate. Data security is therefore best served by working within the web application.

2.21 A list of key questions is provided at Appendix 5 to help participating bodies focus on the main elements to consider when implementing the NFI.

Part Three: Developing the NFI further

Part Three: Developing the NFI further

The NFI has a proven track record for tackling fraud and error

- 3.1 Public services are under increasing pressure in terms of resources, so it is vitally important to ensure that public money is spent only on those legitimately entitled to it, that they are paid the correct amount, and that payments founded on fraud and error are detected and stopped at the earliest opportunity. Money lost due to fraud and error can have a direct impact on front-line services.
- 3.2 The outcomes achieved so far from the NFI in Northern Ireland clearly illustrate the benefits of data matching as a means of detecting fraud, securing recovery of funds and providing a deterrent effect. It is important that this success is translated into renewed efforts to extend the scope of the initiative.

There is scope for extending the coverage of the NFI

- 3.3 We are continuing to explore the possibility of further data matches and are pleased that we have had approaches from some bodies which have seen the benefits of the NFI and are keen to explore how its application can be extended to other data sets. We are currently exploring two potential pilot exercises and hope to include these in NFI 2012-13.
- 3.4 There are still significant areas of public expenditure in Northern Ireland which are not included in the NFI. For example,

the two universities and the two teacher training university colleges are funded through the Department of Employment and Learning but, because they are not audited by NIAO, they are not required to participate in the NFI. We will be inviting them to take part in NFI 2012-13 as voluntary participants.

- 3.5 The Police Service of Northern Ireland, the Northern Ireland Prison Service, the Northern Ireland Policing Board and the Office of the Police Ombudsman were invited to participate in NFI 2010-11. However, because the NFI system is accredited to hold data to restricted level, and police and prisons data is confidential, this did not happen. We are continuing to explore with these bodies how their data might be included in NFI 2012-13.
- 3.6 In its contracts with accountancy firms contracted to carry out its audits, the Audit Commission includes a clause that those firms will be expected to submit their data for inclusion in the NFI. There is scope in Northern Ireland for adopting this approach, not just for accountancy firms contracting directly with NIAO but for all bodies who are contracted to provide goods or services to the public sector. The feasibility of this approach has been discussed with the Central Procurement Directorate (CPD) which reviews and develops procurement policy for Northern Ireland and provides procurement services for the Northern Ireland public sector. We will seek to develop this further with CPD.

NIAO is keen to work with any bodies seeking to tackle fraud

3.7 We welcome contact from any public and private sector bodies keen to do more to tackle fraud and would be happy to discuss any potential data matches that may further assist with the detection of fraud and error.

Prevention is better than cure – real time data matching

3.8 In response to the Government's emphasis on fraud prevention, the Audit Commission launched its first real time data matching service in September 2011, comparing applications for financial services with UK Border Agency data. It plans to expand real time data matching into other areas, for example:

- housing benefit – matching claimant details with information on known stolen/false identities before awarding benefit;
- payroll – matching job applicant details against UK Border Agency data to confirm entitlement to work before offering employment; and
- blue badges – matching applicants against death records before issuing badges.

We will discuss with the Audit Commission how any such initiatives may be applied in Northern Ireland.

NIAO is indebted to the Audit Commission for its support in implementing the NFI in Northern Ireland

3.9 Once again, we thank the Audit Commission which has provided invaluable support in the development and operation of the NFI in Northern Ireland and has helped bodies here achieve very significant outcomes.

Appendix 1: Overview of the National Fraud Initiative (paragraph 1.1)

What is data matching?

1. Data matching uses a computerised application to compare sets of data held by public bodies on different financial systems, such as payroll, pensions, benefits and trade creditors, to uncover instances of potential fraud or error. The table below sets out the types of matches undertaken and the potential fraud or error they might reveal.

Where a match is found, there is no presumption of fraud; the match simply indicates that there may be an inconsistency that requires further investigation.

The National Fraud Initiative (NFI)

2. Data matching has been used very successfully by the Audit Commission¹⁶ every two years since 1996, under

Data match	Potential fraud or error
Payroll to payroll	Employees working elsewhere whilst on sick leave or employees being paid for two full time posts with different organisations.
Housing benefit payments to payroll	Claimants not declaring income which may remove entitlement to housing benefit or reduce the amount of benefit payable.
Housing benefit payments to pensions	Pensioners in receipt of housing benefit not declaring their full pension income.
Housing benefit payments to taxi driver licenses	Claimants not declaring income which may remove entitlement to housing benefit or reduce the amount of benefit payable.
Pensions to death records	Pension wrongly paid to a pensioner who is deceased but relatives fail to notify the pension administrator.
Pensions to payroll	Overpayment of pension due to return to work in the same sector after retirement (if applicable).
Blue badges to death records	Fraudulent use of badges where holder is deceased.
Concessionary travel passes to death records	Fraudulent use of travel pass where holder is deceased.
Private supported care home payments to deceased persons.	Payments still being made to care homes after the date of a resident's death.
Payroll to failed asylum seekers and expired visa records	Someone who is employed in the public sector but is not entitled to be in the UK.

¹⁶ The Audit Commission is responsible for the audit of local authorities in England.

the banner of *'The National Fraud Initiative'*, to detect frauds and incorrect payments. To date, the Audit Commission has identified outcomes of over £939 million¹⁷. The Comptroller and Auditor General (C&AG) participated in the NFI for the first time in 2008-09, benefiting from the infrastructure already established by the Audit Commission. By the date of publication of his first report on the NFI, over £11 million of outcomes had been identified in Northern Ireland. Northern Ireland data are shared with other public audit agencies in the UK (the Audit Commission, the Wales Audit Office and Audit Scotland), which enables cross-jurisdictional matching to take place.

Code of Data Matching Practice

3. A Code of Data Matching Practice¹⁸ applies. It promotes good practice and helps ensure that data matching exercises comply with the law, especially the provisions of the Data Protection Act 1998. It also lets individuals know why their data is matched, the standards that apply and where they can find further information.

4. The processing of data by the C&AG in a data matching exercise is carried out with statutory authority and does not require the consent of the individuals concerned. In compliance with the Data Protection Act 1998, participating bodies inform individuals that their data will be processed, by way of a "fair processing notice". This indicates that their data will be subject to audit for the purpose of detecting and preventing fraud.

Who participates in data matching?

5. Bodies whose accounts are audited by the C&AG or a local government auditor¹⁹ may be required to participate in the NFI where there is reasonable evidence that fraud is likely to be found. Other bodies, both public and private sector, may participate on a voluntary basis where the C&AG considers it appropriate. The C&AG will only choose data sets to be matched where he has reasonable evidence of fraud. Participating bodies in Northern Ireland have submitted a range of data sets for matching, as set out overleaf.

17 The National Fraud Initiative, National Report, Audit Commission, May 2012

18 Prepared by the C&AG under Article 4G of the Audit and Accountability (Northern Ireland) Order 2003 and available at www.niauditoffice.gov.uk

19 Local government auditors are designated under the Local Government (Northern Ireland) Order 2005

Appendix 1: (paragraph 1.1)

Bodies	Core data sets submitted
Northern Ireland departments, including executive agencies; health service bodies and other central government bodies; local government bodies.	Payroll, Pensions, Trade Creditors standing data and payments history
	Additional data sets submitted
Health and Social Care Trusts	Private supported care home residents
Roads Service	Blue badges
Translink	Concessionary travel passes
Driver and Vehicle Agency	Taxi driver licenses
Northern Ireland Housing Executive	Housing benefit Housing tenants Right to buy
Land and Property Services	Housing benefit Rate relief Domestic rates
The Electoral Office for Northern Ireland	Electoral register

How is data secured?

6. The NFI uses a secure web-based application both for the transmission of data from the participating bodies to the Audit Commission for processing, and for the accessing of matches by the participating bodies. Data is encrypted and uploaded directly from organisations' computer systems over a secure internet connection, is held on secure servers, and is subject to strict password access. The NFI's systems are accredited to handle, store and process information up to the restricted classification level. Additional assurance comes from ongoing joint security audits involving the UK public audit agencies, including NIAO.

What training and support is given to participating bodies?

7. NIAO, assisted by the Audit Commission, provides guidance to participating bodies via the secure NFI website. NIAO also liaises with individual bodies as required to discuss the NFI and monitor progress in the investigation of matches and, alongside the Audit Commission, is available to handle queries that arise.

How are matches investigated?

8. Participating bodies are expected to review all data match reports and decide on their approach to investigation based on their knowledge of the business areas, any assessed level

of risk and the level of resources that they can devote to investigation work.

Bodies are not expected to investigate all data matches.

9. Data match reports separately identify **recommended filter matches**. These are the highest priority matches within each report and should ideally be investigated as a minimum. Other matches may be investigated on a sample basis. The NFI software also allows bodies to use their own knowledge of data sets to prioritise matches based on their own filters, before commencing investigations. **It is ultimately a matter for bodies to decide which matches, and how many matches, they investigate.**
 10. The NFI web application provides a mechanism for the investigating body to track progress and outcomes on investigations. It also facilitates the sharing of information arising from follow up and investigation with the body on the other side of the match.
-

Appendix 2: NFI 2010-11 – Participating Bodies (paragraph 1.3)

Mandatory Participants

Northern Ireland Departments:

Department of Agriculture and Rural Development
Department of Culture, Arts and Leisure
Department of Education
Department for Employment and Learning
Department of Enterprise, Trade and Investment
Department of the Environment
Department of Finance and Personnel
Department of Health, Social Services and Public Safety
Department of Justice
Department for Regional Development
Department for Social Development
Office of the First Minister and Deputy First Minister
Public Prosecution Service (non-ministerial)

Executive Agencies

Rivers Agency
Forest Service
Driver and Vehicle Agency
Environment and Heritage Agency
Planning Service
Roads Service
Social Security Agency
Land and Property Services Agency
Northern Ireland Statistics and Research Agency
Northern Ireland Guardian ad Litem Agency
Northern Ireland Medical and Dental Training Agency
Labour Relations Agency
Youth Justice Agency of NI
Compensation Agency
Forensic Science NI
NI Courts and Tribunals Service
Public Health Agency

Other central government bodies:

Belfast Education and Library Board
North Eastern Education and Library Board
South Eastern Education and Library Board
Southern Education and Library Board
Western Education and Library Board
Invest Northern Ireland
Northern Ireland Assembly
National Museums and Galleries of Northern Ireland
NI Council for the Curriculum, Examinations and Assessment
Northern Ireland Fire and Rescue Service
Northern Ireland Housing Executive
Northern Ireland Tourist Board
Arts Council of Northern Ireland
Sport Northern Ireland
Livestock and Meat Commission
Agri-Food and Biosciences Institute
Libraries NI
Council for Catholic Maintained Schools W5
Construction Industry Training Board
Ulster Supported Employment Ltd
Belfast Metropolitan College
South West College
South Eastern Regional College
Southern Regional College
Northern Regional College
North West Regional College
General Consumer Council
Health and Safety Executive
Commissioner for Children and Young People NI
Equality Commission Northern Ireland
Strategic Investment Board
NI Legal Services Commission
Probation Board for Northern Ireland
NI Authority for Utility Regulation

Health Services Bodies:

Business Services Organisation
Health and Social Care Board
Belfast Health and Social Care Trust
Northern Health and Social Care Trust
South Eastern Health and Social Care Trust
Southern Health and Social Care Trust
Western Health and Social Care Trust
Regulation and Quality Improvement Authority
Northern Ireland Blood Transfusion Service
NI Ambulance Service HSS Trust

Local Government Bodies:

Antrim Borough Council
Ards Borough Council
Armagh City and District Council
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Belfast City Council
Carrickfergus Borough Council
Castlereagh Borough Council
Coleraine Borough Council
Cookstown District Council
Craigavon Borough Council

Derry City Council
Down District Council
Dungannon and South Tyrone District Council
Fermanagh District Council
Larne Borough Council
Limavady Borough Council
Lisburn City Council
Magherafelt District Council
Moyle District Council
Newry and Mourne District Council
Newtownabbey Borough Council
North Down Borough Council
Omagh District Council
Strabane District Council
NI Local Government Officers' Superannuation
Committee
Arc21

Voluntary participants

Electoral Office
Northern Ireland Audit Office
Translink
NI Water

Appendix 3: Basis of calculation of outcomes, including forward savings (paragraph 1.6, footnote 3)

Data set	Basis of calculation
Housing benefit	Value of fraud or error detected plus forward savings calculated as the weekly benefit reduction multiplied by 13
Pensions	Cabinet Office formula: annual pension multiplied by the number of years until the pensioner would have reached the age of 90
Creditors	Value of overpayments
Rates	Value of fraud or error detected plus forward savings calculated as the average annual rates bill (£700) multiplied by 3
Payroll and other	Value of overpayments
Private supported care home residents	Value of overpayments plus forward savings calculated as the average weekly care home cost (£427) x 13 weeks, rounded down to £5,000

Appendix 4: Summary of NFI outcomes to date in Northern Ireland (paragraph 1.6)

Data set	NFI 2008-09 outcomes			NFI 2010-11 outcomes	Total NFI outcomes to date
	By 31 March 2010 £	Late savings to 31 March 2012 £	Total £	By 31 March 2012 £	£
Housing benefit	1,322,864	3,887,242	5,210,106	1,139,558	6,349,664
Pensions	729,160	85,582	814,742	2,042,811	2,857,553
Rates	979,596	11,697,200	12,676,796	1,522,405	14,199,201
Creditors	208,536	12,709	221,245	373,926	595,171
Payroll and other	15,019	3,921	18,940	1,853	20,793
Residential care homes	0	0	0	14,820	14,820
Total	3,255,175	15,686,654	18,941,829	5,095,373	24,037,202

Basis of reporting outcome figures

Our previous report on NFI 2008-09 highlighted savings of £3.3 million by 31 March 2010 and expected total outcomes of over £16 million. The table above shows that total outcomes for NFI 2008-09 were around £18.9 million.

The Audit Commission produces the national report on the basis of outcomes over a two-year period, in this case from 1 April 2010 to 31 March

2012. This year it has reported £20.8 million of outcomes for Northern Ireland, made up of "late savings" of £15.7 million from the 2008-09 exercise and outcomes so far of £5.1 million from the 2010-11 exercise. Scotland and Wales also report on this basis. This is the basis that will now be used in the Northern Ireland report, to ensure consistency. The table overleaf sets out the figures used in the main report.

Appendix 4: (paragraph 1.6)

Data set	Late savings 1 April 2010 to 31 March 2012 £	Outcomes from 2010-11 NFI matches by 31 March 2012 £	Report total £
Housing benefit	3,887,242	1,139,558	5,026,800
Pensions	85,582	2,042,811	2,128,393
Rates	11,697,200	1,522,405	13,219,605
Creditors	12,709	373,926	386,635
Payroll and other	3,921	1,853	5,774
Residential care homes	0	14,820	14,820
Total	15,686,654	5,095,373	20,782,027

NFI 2012-13 will include outcomes from 1 April 2012 to 31 March 2014.

Outcomes are made up of actual fraud, error and overpayments identified by participating bodies and recorded on their web application plus, where appropriate, an estimated amount using the calculations set out in Appendix 3.

Appendix 5: Key Questions for organisations participating in NFI (paragraph 2.21)

Ideally, an organisation should be able to answer "Yes" to all these questions.

Strategic level

1. Is senior management committed to the principles of the NFI eg through:
 - an explicit expression of support?
 - seeking regular feedback on the progress of each NFI exercise?
 - reporting of NFI outcomes at a senior level within the organisation?
2. Is the NFI embedded in the counter-fraud strategy of our organisation?
 - Is it included as part of our counter-fraud policy?
 - Is it an agenda item at Board meetings / Audit Committee meetings?
 - Is an appropriate sanctions policy in place to deal with frauds detected through the NFI?
 - Are outcomes publicized both internally and externally, to highlight the value of the NFI and to provide a deterrent effect?
3. Is the key contact an appropriate person to fulfil the role and does (s)he have the requisite time and authority to do so?
4. Are all relevant data sets submitted on time via the secure web application and are fair processing requirements met?
5. Are we aware that we are not required to investigate all matches and do we adopt a risk-based approach to the selection of matches for investigation across all reports?
6. Do we carry out investigation work *within* the secure web application in order to reduce the burden of the NFI and ensure data security?
7. Is NFI investigation work started promptly so that any fraud found can be stopped as quickly as possible?
8. Are appropriate staff, with a good knowledge of the business areas under investigation, set up as users and given access to the relevant matches on the web application?
9. Are outcomes recorded promptly on the web application so that the Director of Finance and key contact can monitor progress and ensure that appropriate investigation work has been undertaken?
10. In light of NFI fraud investigations, do we address any control weaknesses identified?

Operational level

3. Is the key contact an appropriate person to fulfil the role and does (s)he have the requisite time and authority to do so?
-

NIAO Reports 2011-2012

Title	Date Published
2011	
Compensation Recovery Unit – Maximising the Recovery of Social Security Benefits and Health Service Costs from Compensators	26 January 2011
National Fraud Initiative 2008 - 09	16 February 2011
Uptake of Benefits by Pensioners	23 February 2011
Safeguarding Northern Ireland’s Listed Buildings	2 March 2011
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