Annex 2: Counter Fraud and Corruption Strategy Action Plan

Ongoing Activity:

Ref	Action Required	Responsibility	Update	Status
1	Prepare a counter fraud strategy which acknowledges fraud risks facing the council and sets overall counter fraud aims. The strategy should highlight links to existing counter fraud related policies and set out actions required for developing counter fraud arrangements.	Chief Finance Officer / Veritau	A new counter fraud strategy was introduced in 2017 and has been subject to annual review since then. The strategy is expected to be updated in 2020 when the Fighting Fraud Locally board issues a revised counter fraud strategy for local government.	Annual Review
2	Prepare an updated counter fraud policy to take account of the latest national guidance, and reflecting changes to the councils counter fraud arrangements.	Chief Finance Officer / Veritau	An updated counter fraud policy was approved in February 2017. Annual reviews have been undertaken each January since 2018.	Annual Review
3	Review and update counter fraud risk assessment.	Veritau	A risk assessment is presented annually to the Audit and Governance Committee (see annex 3 for the 2020 update).	Annual Review
4	Develop regional / local data matching and counter fraud exercises.	Veritau	Data matching is an important area within local authority counter fraud work. It facilitates the detection of frauds that would not normally be	Ongoing

Ref	Action Required	Responsibility	Update	Status
			detected by members of staff or the public. Data matches can be undertaken internally, with regional partners, and nationally through exercises like the National Fraud Initiative. The counter fraud team is currently moving forward with new datamatching projects designed to detect fraud within Adult Social Care, Housing, Parking and Council Tax. These are highlighted in the one-off development section of this plan (see ref 5).	
5	Undertake specific fraud awareness training for priority service areas.	Veritau	Training is delivered on a rolling basis depending on priorities and emerging fraud risks. Area specific training has been delivered to the social care, council tax and business rates teams in 2019/20.

In addition specific risks and examples of frauds occurring nationally have been flagged to staff through regular email alerts. | Ongoing |
| 6 | Review the extent to which counter fraud risks are identified through service risk management arrangements. Assess whether arrangements can be strengthened with additional specialist counter | Veritau / Service managers | Service managers are responsible for maintaining service level risk registers. Fraud risk is considered is some areas but not universally. The counter fraud team is working with council managers to ensure that fraud risks are included within relevant risk registers. | Ongoing |

Ref	Action Required	Responsibility	Update	Status
	fraud input (eg through risk workshops).			
7	Raise awareness of cyber security issues and promote good practice.	Veritau / ICT department	Veritau monitors national guidance to help raise awareness of cybercrime issues within the council. Veritau will work with the ICT team to coordinate projects to deliver key messages to staff. In September 2019 the counter fraud team held a cybercrime awareness week to raise awareness with members of staff and the public.	Ongoing
8	Review wider governance and other policies (eg employee related policies, gifts, interests, financial regulations) to ensure they: • cover all required areas • are consistent with the counter fraud strategy and policy.	Veritau / relevant policy owners	Council policies are regularly reviewed in the course of Internal Audit work. Any inconsistencies or weaknesses in terms of fraud detection and prevention are flagged to the counter fraud team.	Ongoing

One Off and Developmental Activity:

Ref	Action Required	Target Date	Responsibility	Notes
1	Increase ability to detect procurement fraud.	September 2020	Veritau	The counter fraud team is exploring the use of the Competition and Markets Authority's cartel screening tool to detect fraud within council procurement exercises. There have been technical issues but the product is now believed to be stable and working. Discussions are to be held with the procurement team to test the software.
2	Revise Regulation of Investigatory Powers Act (RIPA) policy to reflect new powers under the Investigatory Powers Act (IPA) and provide a framework for the council to undertake employee monitoring outside of RIPA.[1]	August 2020	Veritau / Legal Department / Trading Standards	Changes to the council's RIPA policy are required to reflect the new powers under the IPA as well as reflecting the council's ability to undertake employee monitoring in certain situations.
3	Promote updated whistleblowing policy within the council.	September 2020	Veritau / HR	Awareness of the updated whistleblowing policy will be provided to all staff but especially to managers who have new guidelines and responsibilities around the reporting and investigation of concerns.

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[1] This action has been revised to include IPA powers. The target date has been extended from August 2019 to take into account the additional work.

Ref	Action Required	Target Date	Responsibility	Notes
4	Explore formation of a regional group with the aim of preventing and detecting adult social care fraud.	December 2020	Veritau	A new regional group dedicated to adult social care fraud could be of benefit to the council and other local authorities in the region.
5	Undertake datamatching exercises in relation to adult social care, right to buy, and council tax fraud.	July 2020	Veritau	New datamatching exercises will be undertaken to produce matches of possible fraud in these three areas.

Completed Activities:

Ref	Action Required	Responsibility	Update
1	Identify tools available for estimating potential fraud exposure / losses. Assess their effectiveness and appropriateness for use as part of counter fraud risk assessment.	Veritau	Discussions have been held with colleagues from other councils and a review conducted to identify potential tools available on the market to estimate local fraud levels. No solutions have been found but we will continue to monitor this area.
2	Consider whether specific targets can be set under each of the Fighting Fraud Locally themes.	Veritau	Fighting Fraud Locally 2016 recommended six themes to measure performance on. Actions already undertaken (and planned) cover all of the themes, although specific targets have not been set. The themes, and examples of activity, are listed below. **Culture** - The council has appropriate policies and strategy in place. Veritau promotes a counter fraud culture through newsletters and alerts as well as targeted fraud awareness. **Capability / Competence** – All of Veritau Investigation Officers are Accredited Counter Fraud Specialists. **Capacity** – The council has access to dedicated counter fraud resources (through Veritau). **Communication** – Fraud issues are routinely communicated to members, managers and staff at the council. The Counter Fraud Team works with service departments in preventing and investigating fraud.

Ref	Action Required	Responsibility	Update
			Collaboration – The council works collaboratively with a number of other local authorities, and other partners including the police and DWP.
3	Launch and promote regional fraud hotline.	Veritau	A new 0800 regional fraud hotline number was introduced in 2017.
4	Liaise with HR officers to incorporate general counter fraud awareness training into induction training for all new employees.	Veritau	Veritau working with the Council's Workplace Development Unit put in place a counter fraud e-learning package in 2018 which is now available to new and existing employees.
5	Review and update whistleblowing policy and procedures.	Veritau / HR / Monitoring Officer	An updated whistleblowing policy was approved in January 2020.
6	Improve prevention and detection strategies for Right to Buy fraud	Veritau / Service departments	New joint working processes between the counter fraud team and the Right To Buy team were agreed and started in 2019.
7	Participate in a regional bid to pilot business rates data matching with the National Fraud Initiative (NFI)	Veritau	The Council successfully bid and participated in an NFI business rates pilot alongside regional partners. The project achieved good results and raised awareness of the issues associated with fraud in this area.