

## Annex 2: Counter Fraud and Corruption Strategy Action Plan

Ref	Action Required	Original Target Date	Responsibility	Update	Revised Target date
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.	February 2017	Chief Finance Officer / Veritau	A new Counter Fraud Strategy was approved by in February 2017.  To be reviewed annually. The current report reflects the first annual review in February 2018.	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 following the transfer of benefit fraud investigation to the DWP.	February 2017	Chief Finance Officer / Veritau	An updated policy was approved in February 2017.  The policy has been reviewed in February 2018 - no updates are required at this time.	Annual Review
3	Review and update counter fraud risk assessment.  (Note that separate actions are included within the risk assessment to address specific issues identified.)	February 2017	Veritau	A risk assessment is presented annually to the Audit and Governance Committee (see Annex 3 for February 2018 update).	Annual Review

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4	<p>Develop regional / local data matching and counter fraud exercises. (i)</p> <p>A cross boundary data matching exercise on council tax and NNDR discounts and exemptions is in progress. Detailed review of outcomes / investigations now started.</p>	February – October 2017	Veritau	See Ref 8 below.	Ongoing
5	Review and update whistleblowing policy and procedures.	May 2017	Veritau / HR / Monitoring Officer	Work has begun on a new policy and procedures. The new policy should be in place during 2018/19.	March 2019
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 fraud input (eg through risk workshops).	August - December 2017	Veritau / service managers	Discussions are scheduled with the council's risk management team to determine the best way to ensure that fraud risks are factored into service level registers.	Ongoing
7	Undertake specific fraud awareness training for priority service areas identified through the fraud risk assessment.	October 2017	Veritau	Fraud awareness sessions have been undertaken with a variety of council departments, including the Income Services Team, Customer Services team and Benefits Department. In	Ongoing

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				addition specific risks have been flagged to staff through alert emails.	
8	<p>Develop regional / local data matching and counter fraud exercises (ii).</p> <p>Review outcomes from earlier exercise (see 4) and determine future target areas and timetable for local / regional data matching.</p>	October – December 2017	Veritau	<p>Cross boundary data matching with regional partners is underway. A match of Council Tax data has been completed and the results are being reviewed jointly with the council tax team. Further work is planned around council tax, parking permits, adult social care and business rates discounts.</p> <p>This is an ongoing project - periodic matching exercises will be undertaken on a rolling basis.</p>	Ongoing
9	Identify tools available for estimating potential fraud exposure / losses. Assess their effectiveness and appropriateness for use as part of counter fraud risk assessment.	November – December 2017	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.	N/A
10	Consider whether specific targets can be set under each of the Fighting Fraud Locally themes.	December 2017	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	N/A

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				<p>examples of activity, are listed below.</p> <p><b>Culture</b> - 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.</p> <p><b>Capability / Competence</b> – All of Veritau Investigation Officers are Accredited Counter Fraud Specialists.</p> <p><b>Capacity</b> – The council has access to dedicated counter fraud resources (through Veritau).</p> <p><b>Communication</b> – 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.</p> <p><b>Collaboration</b> – The council works collaboratively with a number of other local authorities, and other partners including the police and DWP.</p>	

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11	Liaise with HR officers to incorporate general counter fraud awareness training into induction training for all new employees.	March 2018	Veritau / Head of HR	This project is ongoing. Veritau are currently in contact with software suppliers to help deliver an online fraud awareness solution.	March 2019
12	Review wider governance and other policies (eg employee related policies, gifts, interests, financial regulations) to ensure they: <ul style="list-style-type: none"> <li>cover all required areas</li> <li>are consistent with the counter fraud strategy and policy.</li> </ul>	March 2018	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
13	Launch and promote regional fraud hotline	N/A	Veritau	A new 0800 regional fraud hotline number has been introduced by Veritau. The hotline is already active. Further publicity is planned to promote the new number.	Ongoing
14	Raise awareness of cyber security issues and promote good practice.	N/A	Veritau	Working with the ICT department Veritau will make staff aware of guidance from the National Cyber Security Centre. This will include posters and email alerts.	Ongoing
15	Increase ability to detect procurement fraud.	N/A	Veritau	The counter fraud team will explore usage of the Competition and Markets Authority's cartel screening tool to detect potential fraud within council	March 2019

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				procurement exercises.	