






# Code of Practice on Managing the Risk of Fraud & Corruption



**Report Type:** Actions Report  
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Principle Title	Principle Description	Specific Steps	Action to Date	Status	Plan Action Progress to Date
Acknowledge Responsibility	The governing body should acknowledge the responsibility for ensuring that the risks associated with fraud and corruption are managed effectively across all parts of the organisation.	Acknowledgement – The organisation's leaders acknowledge the threats of fraud and corruption, the harm they can cause and the potential for savings from managing the risks.	The revised policy now includes the sign off acknowledgement		100%
		Culture – The organisation's leaders acknowledge the importance of a culture that is resilient to the threats of fraud and corruption and aligns to the standards of good governance.	The revised policy now includes the sign off acknowledgement		
		Improving resilience – The governing body sets a specific goal for improving its resilience to fraud and corruption	Counter fraud workplan in place and reviewed and reported to the Audit & Governance Committee		
		Responsibility – The governing body acknowledges its responsibility for managing its fraud and corruption risks and will be accountable for the actions it takes through its	This is completed through the reporting of fraud risks to the Audit & Governance Committee		

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		governance reports			
Identify Risk	Fraud risk identification is essential to understand specific exposure to risk, changing patterns in fraud and corruption threats and the potential consequences to the organisation and its service users	Corruption risk – The organisation identifies the risks of corruption in its governance framework	Steps to counter fraud are highlighted in the Annual Governance Statement as part of the governance framework, the counter fraud update is reported to the Audit & Governance Committee		<div style="border: 1px solid black; background-color: #e6f2ff; padding: 2px; display: inline-block;">66%</div>
		Fraud Risks – Fraud risks are routinely considered as part of the organisation’s strategic risk management arrangements	Fraud risk register is in place and reviewed and reported to the Audit & Governance Committee		
		Measurement of Loss – The organisation uses estimates of fraud loss, and where appropriate measurement exercises, to quantify the harm that different fraud risks cause	Need to establish a measure for fraud loss		
Develop a Strategy	An organisation needs a counter fraud strategy setting out its approach to managing its risk and defining responsibilities for action	Responsibility & Accountability – the strategy includes clear identification of responsibility and accountability for delivery of the strategy and for providing oversight	The Executive Director – Corporate Services has overall responsibility		<div style="border: 1px solid black; background-color: #e6f2ff; padding: 2px; display: inline-block;">100%</div>
		Strategy – The governing body formally adopts a counter fraud and corruption strategy to address the identified risks and align with the	Included in the statement		

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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 67</p>		organisation's acknowledged responsibilities and goals			
		The strategy includes consideration of all the proactive components of a good practice response to fraud risk management:	Developing a counter fraud culture to increase resilience to fraud, deterring fraud attempts by publishing the actions the organisation takes against fraudsters, preventing fraud through the implementation of appropriate and robust internal controls and cyber security measures. All of these areas included in the strategy		
		The strategy includes consideration of all the reactive components of a good practice response to fraud risk management	Detecting fraud through data and intelligence analysis, implementing effective whistleblowing arrangements, investigating fraud referrals, applying sanctions, both civil and criminal, seeking redress, including the recovery of assets and money. All of these areas included in the strategy		
Provide Resources	The organisation should make	Access – The organisation grants	This is stated in Financial		<div style="border: 1px solid black; background-color: #ADD8E6; padding: 2px; display: inline-block;">75%</div>

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Page 68	arrangements for appropriate resources to support the counter fraud strategy	counter fraud staff unhindered access to its employees, information and other resources as required	Guidance		
		Annual assessment – an annual assessment of whether the level of resource invested to counter fraud and corruption is proportionate for the level of risk	Completed as part of the annual review		
		Data sharing – the organisation has protocols in place to facilitate data and intelligence sharing to support counter fraud activity	The Director – Technology & Corporate Programmes has confirmed that the development of the Protocol will be completed by 31 March 2016		
		Skills – the organisation utilises counter fraud staff with appropriate skills and professional accreditation	A Corporate Anti Fraud Investigations Officer has been in post since September 2015 to investigate all fraud		
Take Action	The organisation should put in place the policies and procedures to support the counter fraud and corruption strategy and take action to prevent, detect and investigate fraud	Alignment to Strategy – plans and operations are aligned to the strategy and contributes to the achievement of the organisations overall goal of improving resilience to fraud and corruption	A Counter Fraud Workplan is in place and aligned to the Strategy		
		Annual Report – the governing body receives a report at least annually on the impact and cost effectiveness of	To be completed as part of the annual report to the Audit & Governance		

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		its counter fraud activities	Committee		
		Policy Framework – the organisation has put in place a policy framework which supports the implementation of the counter fraud strategy	The authority has the following policies in place: Counter Fraud & Corruption Strategy, Policy and Guidance Notes Whistleblowing Policy Anti Money Laundering Policy Gifts and Hospitality Policy & Register Codes of Conduct for Members (includes Pecuniary Interests) and staff (includes Declaration of Interests) IT Policies that cover the elements required in a Cyber Security Policy		
		Reporting – there is a report to the governing body at least annually on performance against the counter fraud workplan from the lead person designated in the strategy. Conclusions are featured in the Annual Governance Report	Performance against the Counter Fraud Plan is reported to the Audit & Governance Committee and a statement included in the Annual Governance Statement		

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