

## Fraud Action Plan 2019/20

**Report Type:** Actions Report

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| Fraud Response Area  | Creating an Anti-Fraud Culture  |                     |                                 |
|--|---|---------------------|---------------------------------|
| Description  | To build an anti-fraud culture through the adoption of various measures to promote counter fraud awareness.   | Status Progress Bar | <input type="text" value="0%"/> |
| Risks  | Failure to make staff, member and the public that their suspicions will be treated confidentially, objectively and professionally                               | Allocated Resources |                                 |
|  | Failure to make available enough resources for counter fraud work   |                     |                                 |
| Actions  | Action Notes  | Due Date            | Completed Date                  |
| Check ID verification procedures in place and review for adequacy  | ID verification procedures reviewed Council wide. Conclusion - adequate arrangements in place. Draft report produced to be reviewed and issued.                 | 31-Sep-Oct-2019     |                                 |
| Check what data sharing agreements are in place eg RSL's   | To be covered within the GDPR audit.  | 31-Oct-2019         |                                 |
| Complete an annual assessment of whether the level of resource invested to counter fraud and corruption is proportionate for the level of risk |   | 31-Mar-2020         |                                 |
| Provide drop in sessions to staff and members as required  | Drop in session planned for following Audit & Governance Committee's consideration of the new counter fraud and corruption policy, strategy and guidance notes. | 31-Oct-2019         |                                 |
| Roll out the e-learning packages for counter fraud   |   | 31-Dec-2019         |                                 |
| Use of AppCheck - record all usage and any saving identified   |   | 31-Mar-2020         |                                 |

|   |   |                            |                                  |
|---|---|----------------------------|----------------------------------|
| <b>Fraud Response Area</b>  | <b>Deterring Fraud</b>  |                            |                                  |
| <b>Description</b>  | <b>Deterring fraud through proactive communications</b>   | <b>Status Progress Bar</b> | <input type="text" value="25%"/> |
| <b>Risks</b>  | A lack of robust strategic approach to deterring fraud can undermine actions to build an anti-fraud culture | <b>Allocated Resources</b> | 10 days                          |
|   | A lack of understanding as to the stance the authority takes against fraud                                  |                            |                                  |
| <b>Actions</b>  | <b>Action Notes</b>   | <b>Due Date</b>            | <b>Completed Date</b>            |
| Attend housing meetings to promote fraud service – quarter 1  | Attended Housing meetings in Q1   | 30-Jun-2019                | 03-Jul-2019                      |
| Attend housing meetings to promote fraud service – quarter 2  | Attended Housing meetings in Q2   | 30-Sep-2019                | 30-Sep-2019                      |
| Attend housing meetings to promote fraud service – quarter 3  |   | 31-Dec-2019                |                                  |
| Attend housing meetings to promote fraud service – quarter 4  |   | 31-Mar-2020                |                                  |
| Contact Leanne regarding attendee at Landlord forum – potential to sell fraud service to RSL's/joint working  | Added to the attendee list for next meeting which is due to be arranged.                                    | 30-Sep Dec-2019            |                                  |
| Deter fraud by publishing the Counter Fraud & Corruption Strategy and Policy on the website   |   | 31-Mar-2020                |                                  |
| Develop a risk register and carry out relevant testing against the internal controls in relation to Corporate Criminal Offences (CCO) Legislation.  | Draft policy complete and to be consulted upon. Risk register to be completed.                              | 31-Oct-2019                |                                  |
| Review communications so that the most effective ways of communicating with staff are utilised by the evaluation and adaption of National Fraud Authority fraud campaign pack being completed for roll out with the E learning solution |   | 31-Dec-2019                |                                  |

|                            |   |                            |                                 |
|----------------------------|---|----------------------------|---------------------------------|
| <b>Fraud Response Area</b> | <b>Preventing Fraud</b>   |                            |                                 |
| <b>Description</b>         | <b>Preventing fraud by ensuring that relevant policies are in place and fraud risks are identified.</b> | <b>Status Progress Bar</b> | <input type="text" value="0%"/> |
| <b>Risks</b>               | Out of date policies and procedures which do not cover relevant legislation.                            | <b>Allocated Resources</b> | 30 days                         |
|                            | Potential risks not identified.   |                            |                                 |
|                            | Potential data not identified.  |                            |                                 |

| Actions  | Action Notes | Due Date    | Completed Date |
|--|--------------|-------------|----------------|
| Assist in the fraud proofing of other policies/forms   |              | 31-Mar-2020 |                |
| Implement effective Whistleblowing arrangements – annual review of Whistleblowing Policy   |              | 31-Mar-2020 |                |
| Review and update the Counter Fraud Policy Statement, Strategy & Guidance Notes and update and amend as appropriate  |              | 31-Mar-2020 |                |
| Review and update the fraud risk register in line with the potential systems weaknesses identified during audit or investigations and emerging fraud risks |              | 31-Mar-2020 |                |
| Review Codes of Practice in place for Data Sharing with local partners   |              | 31-Mar-2020 |                |
| Review financial guidance and update and amend as appropriate  |              | 31-Mar-2020 |                |

| Actions   | Action Notes   | Due Date        | Completed Date |
|---|--|-----------------|----------------|
| Annual review and evaluation of the potential use of computer aided and other innovative techniques for the detection of fraud eg data matching                           |  | 31-Mar-2020     |                |
| Annual review of existing arrangements to ensure that the Council is maximising their use eg NAFN – VFM other checks being done in other areas – council tax, housing etc | Draft report completed. To be shared with Housing, revenues and benefits colleagues. | 31-Aug Oct-2019 |                |
| Continue to develop links with external agencies to enhance opportunities for information sharing   |  | 31-Mar-2020     |                |

  

| Fraud Response Area | Detecting Fraud   |                     |                                 |
|---------------------|---|---------------------|---------------------------------|
| Description         | Detecting fraud through proactive investigations  | Status Progress Bar | <input type="text" value="0%"/> |
| Risks               | If not undertaken, there is a risk that the opportunity to abuse a system weakness may be heightened as the risk of being caught maybe deemed negligible by the perpetrator.<br>If not undertaken, there is a risk that fraud could go undetected | Allocated Resources | 70 days                         |

|   |                           |             |  |
|---|---------------------------|-------------|--|
| Proactive testing in line with the fraud risk register and audit plan Treasury management DFG's Payroll Creditors Housing allocations RTB's Council Tax NNDR              |                           | 31-Mar-2020 |  |
| Undertake enquiries/investigations as a result of the outcome of the National Fraud Initiative  | Regular on going activity | 31-Mar-2020 |  |
| Undertake local proactive exercises through data & intelligence analysis at the Authority as agreed with the Executive Director—<br><del>Finance Corporate Services</del> |                           | 31-Mar-2020 |  |

| Fraud Response Area                      |  | Investigations      |                                  |
|--|--|---------------------|----------------------------------|
| Description                              | Investigate fraud in accordance with laid down policies and procedures.  | Status Progress Bar | <input type="text" value="50%"/> |
| Risks                                    | The risk of not investigating is that fraud goes unpunished and there is no resulting deterrent effect thus increasing the prevalence of fraud further | Allocated Resources | 73 days                          |
|  | The staff (or others) making the allegation feel they are not taken seriously and referrals cease to be made.  |                     |                                  |
| Actions                                  | Action Notes   | Due Date            | Completed Date                   |
| Fraud referrals investigated – quarter 1 |  | 30-Jun-2019         | 03-Jul-2019                      |
| Fraud referrals investigated – quarter 2 |  | 30-Sep-2019         | 30 Sept 2019                     |
| Fraud referrals investigated – quarter 3 |  | 31-Dec-2019         |                                  |
| Fraud referrals investigated – quarter 4 |  | 31-Mar-2020         |                                  |

| Fraud Response Area   |   | Sanctions           |                                 |
|---|---|---------------------|---------------------------------|
| Description   | Apply sanctions correctly and consistently                    | Status Progress Bar | <input type="text" value="0%"/> |
| Risks   | If sanctions are not imposed there is no deterrence of fraud. | Allocated Resources | As required                     |
| Actions   | Action Notes  | Due Date            | Completed Date                  |
| Ensure that sanctions are applied correctly and consistently (including internal disciplinary, regulatory & criminal) |   | 31-Mar-2020         |                                 |

|  |  |                            |                                 |
|--|--|----------------------------|---------------------------------|
| <b>Fraud Response Area</b>   | <b>Redress</b>   |                            |                                 |
| <b>Description</b>   | <b>To ensure that redress is calculated correctly</b>  | <b>Status Progress Bar</b> | <input type="text" value="0%"/> |
| <b>Risks</b>   | Fraudsters may not realise that any and all measures will be taken to recover any money lost to fraud. | <b>Allocated Resources</b> | 4 days                          |
| <b>Actions</b>   | <b>Action Notes</b>  | <b>Due Date</b>            | <b>Completed Date</b>           |
| Maintain comprehensive records of time spent on each investigation so that this can be included in any compensation claim. Identify and maintain a record of the actual proven amount of loss so that appropriate recovery procedures can be actioned. |  | 31-Mar-2020                |                                 |

|  |  |                            |                                 |
|--|--|----------------------------|---------------------------------|
| <b>Fraud Response Area</b>   | <b>Strategic Work</b>  |                            |                                 |
| <b>Description</b>   | <b>To maintain mandatory counter fraud arrangements.</b>   | <b>Status Progress Bar</b> | <input type="text" value="0%"/> |
| <b>Risks</b>   | Failure to ensure the completion of mandatory strategic work may mean that the professional knowledge and skills are not maintained to a high standard | <b>Allocated Resources</b> | 10 days                         |
| <b>Actions</b>   | <b>Action Notes</b>  | <b>Due Date</b>            | <b>Completed Date</b>           |
| Attendance at relevant fraud forums/meetings to ensure that professional knowledge and skills are maintained |  | 31-Mar-2020                |                                 |
| Attendance at relevant training as required  |  | 31-Mar-2020                |                                 |
| Completion and agreement of work plan  |  | 31-Mar-2020                |                                 |
| Quarterly reporting of counter fraud work  |  | 31-Mar-2020                |                                 |
| Regular meetings with the Chief Executive  |  | 31-Mar-2020                |                                 |

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