

## Appendix B: 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 link together existing counter fraud related policies and set out actions required for developing counter fraud arrangements.	Chief Finance Officer / Veritau	The strategy, which was first introduced in 2017, is expected to be updated in 2020 when the Fighting Fraud and Corruption 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	<p>An updated policy was presented to the Audit Committee in January 2017 for comment. The policy was subsequently approved by the Executive in April 2017.</p> <p>The policy has been reviewed as part of this report - no updates are required at this time.</p>	Annual Review
3	Undertake a counter fraud risk assessment.	Chief Finance Officer / Veritau	A risk assessment was first undertaken in September 2016. The risk assessment is updated on an annual basis, see appendix C for 2020 update.	Annual Review

Ref	Action Required	Responsibility	Update	Status
4	Participate in regional & local data matching and counter fraud exercises.	Veritau	<p>Data matching exercises are undertaken on a rolling basis. The counter fraud team routinely work on data matching projects to increase the identification of any fraud committed against the council.</p> <p>See One Off and Developmental Activity, reference #4, for current activity in this area.</p>	Ongoing
5	Undertake specific fraud awareness training for priority service areas identified through the fraud risk assessment.	Veritau	Training is delivered on a rolling basis depending on priorities and emerging fraud risks. Fraud awareness training has been delivered to the housing department this year.	Ongoing
6	Review privacy notices to ensure they make clear that data will be shared for the purpose of preventing and detecting fraud.	Veritau / Service departments	Privacy notices are reviewed ahead of providing data to the Cabinet Office as part of the National Fraud Initiative (NFI) which occurs every two years.	Ongoing
7	Raise awareness of cyber security issues and promote good practice.	Veritau	<p>Veritau will monitor guidance from the National Cyber Security Centre and share with members of staff where appropriate.</p> <p>A campaign to raise awareness of the signs and risks of cybercrime was delivered to staff in September 2019.</p>	Ongoing

## One Off and Developmental Activity:

Ref	Action Required	Target Date	Responsibility	Notes
1	Incorporate general counter fraud awareness training into induction training for all new employees.	March 2020	Veritau	A fraud e-learning software provider has been identified and their product is currently under consideration.
2	Increase ability to detect procurement fraud.	September 2020	Corporate Director & s151 Officer / 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. Discussions have begun with the procurement team requesting data to begin testing of the tool.
3	Ensure that up to date policies are in place to enable the council to undertake covert surveillance under the Regulation of Investigatory Powers Act (RIPA) and employee monitoring outside of RIPA.	September 2020	Veritau / Legal Department	An update to the council's RIPA policy is required to incorporate the use of covert surveillance as well as reflecting new powers under the Investigatory Powers Act (IPA).
4	Explore and conduct data matching exercises.	January 2021	Veritau	The counter fraud team to undertake data matching exercises to identify council tax discount fraud alongside regional partners. In

Ref	Action Required	Target Date	Responsibility	Notes
				addition the team will look to utilise the council's own data internally to identify potential housing fraud.
5	Explore additional communication strategies to raise the profile of counter fraud and reporting methods.	January 2021	Veritau / Communication Team	The counter fraud team, working with the council's communication team, will consider council and other local publications to increase fraud awareness. The fraud hotline will also be promoted so residents know how and when to report suspected fraud.
6	Increase use of the National Anti-Fraud Network (NAFN) services across the council.	September 2021	Veritau	Veritau to promote use of NAFN services to help council departments identify fraud and recover losses.
7	Monitor and review upcoming changes to the council tax support (CTS) scheme.	April 2021	Veritau	The council's CTS scheme will change to a banded model in 2020/21. The counter fraud team will work with service departments to ensure that these changes do not negatively affect the council's ability to prevent, detect and investigate CTS fraud.

## Completed Activities:

Ref	Action Required	Target Date	Responsibility	Update
1	Regularly report to the Audit and Governance Committee on counter fraud activity.	January 2017	Veritau	Regular reporting to the committee on fraud activity was introduced in 2017. Four progress reports and one annual policy review are produced for the committee annually.
2	Review wider governance and other policies (e.g. employee related policies, gifts, interests, financial regulations) to ensure they: <ul style="list-style-type: none"> <li>cover all required areas (e.g. anti-bribery)</li> <li>are consistent with the counter fraud strategy and policy.</li> </ul>	March 2017	Veritau	Council policies are regularly reviewed in the course of Internal Audit work. Reviews to date have not highlighted any potential weaknesses.
3	Launch and promote regional fraud hotline.	September 2017	Veritau	A new 0800 regional fraud hotline number was introduced in 2017.
4	Review council recruitment processes.	September 2018	Veritau	A review of recruitment processes was completed in 2018/19 and found to be robust.
5	Improve prevention and detection strategies for Right to Buy Fraud	March 2020	Veritau / Service departments	Working with the housing and legal departments, the counter fraud team have helped to institute a new system of checks on

Ref	Action Required	Target Date	Responsibility	Update
				Right to Buy applications to help prevent fraud in this area.