

## Appendix B: 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 link together existing counter fraud related policies and set out actions required for developing counter fraud arrangements.	February 2017	Chief Finance Officer / Veritau	<p>A new Counter Fraud Strategy was presented to the Audit Committee in January 2017 for comment and subsequently approved by the Executive in April 2017.</p> <p>To be reviewed annually. The current report reflects the first annual review in January 2018.</p>	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	<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 in January 2018 - no updates are required at this time.</p>	Annual Review
3	<p>Review and update counter fraud risk assessment.</p> <p>(Note that separate actions are included within the risk assessment to address specific issues identified.)</p>	September 2016	Chief Finance Officer / Veritau	<p>A risk assessment was presented to the Audit Committee in September 2016. This will be updated annually (see appendix C for January 2018 update).</p>	Annual Review

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4	Participate in regional data matching and counter fraud exercises.	February 2016	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 and business rates discounts.</p> <p>This is an ongoing project - periodic matching exercises will be undertaken on a rolling basis.</p>	Ongoing
5	Regularly report to the Audit and Governance Committee on counter fraud activity.	January 2017	Veritau	A summary of counter fraud investigation work undertaken in 2016/17 was included in the Annual Head of Internal Audit Report which was considered by the committee in June 2017 (see appendix B of that report). All future internal audit progress reports will include an update on investigation work.	Ongoing
6	Undertake specific fraud awareness training for priority service areas identified through the fraud risk assessment.	October 2017	Veritau	<p>The CFT provides ongoing updates on fraud and corruption through the distribution of periodic fraud bulletins and alerts.</p> <p>In addition specific campaigns surrounding whistleblowing and the</p>	Ongoing

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				reporting of theft have been undertaken in 2017/18.	
7	Liaise with HR officers to incorporate general counter fraud awareness training into induction training for all new employees.	September 2016	Veritau	Work has not yet started. This action will be rolled forward into the 2018/19 CFT workplan.	Ongoing
8	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 2017	Veritau	Work has not yet started. This action has been rolled forward into the 2018/19 CFT workplan.	Ongoing
9	Launch and promote regional fraud hotline.	NA	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.	September 2017
10	Review council recruitment processes.	NA	Veritau / Head of HR	Review to consider the robustness of counter fraud checks made on prospective employees.	September 2018
11	Raise awareness of cyber security issues and promote good practice.	NA	Veritau	Make staff aware of national cyber security guidance, through emailed alerts, posters etc.	March 2019

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12	Increase ability to detect procurement fraud.	NA	Veritau	Explore datamatching and tools (e.g. CMA tool) to detect procurement fraud.	March 2019