



Chelmsford City Council

Audit & Risk Committee

14th December 2022

Counter Fraud & Corruption Strategy 2023 and Action Plan

Report by:

Audit Services Manager

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Purpose

The 2023 Counter Fraud and Corruption Strategy encompasses key principles such as acknowledging the responsibility for countering fraud and corruption, identification of fraud and corruption risks, provision of resources to implement the strategy and the action to be taken in response to fraud and corruption.

Recommendations

Committee are requested to note the contents of this report and adopt the Counter Fraud and Corruption Strategy, as well as note and approve the corresponding action plan for its delivery during 2023.

1. Introduction

- 1.1. Public sector organisations have a responsibility to embed effective standards for countering fraud and corruption in their organisations. This supports good governance and demonstrates effective financial stewardship and strong financial management.
- 1.2. CIPFA have reported that public services are more vulnerable than ever to criminal activity. We also know that the pandemic and other global/national issues mean risks will continue to remain high for fraud and economic crime. It is therefore a pertinent opportunity to review, refresh and update the Council's approach to Counter Fraud to ensure it is line with best practice,

CIPFA's guidance on Managing the Risk of Fraud and Fighting Fraud and Corruption Locally.

- 1.3. By adopting the 2023 Counter Fraud and Corruption Strategy, Audit & Risk Committee acknowledge the threats of fraud and corruption and the harm they can cause to the organisation, its aims and objectives and to its service users, as well as the importance of a culture that is resilient to the threats of fraud and corruption and aligns to the principles of good governance.
- 1.4. Supplementing the Strategy is an action plan which sets out how Counter Fraud Strategy will be delivered over the next year to December 2023, and by whom. A key part of this governance and delivery will be the Council's Corporate Governance Group who will provide operational oversight of the Council's counter-fraud activities across the Council.
- 1.5. Work to March 2023 includes:
 - Updating the Council's Fraud Risk Register and undertaking a role-based Bribery and Corruption risk assessment, and reviewing any mitigating actions required arising from the assessments.
 - Producing a revised Fraud Response Plan aligned to the new Counter Fraud and Corruption Strategy, including specialist fraud areas such as Housing, Revenues and Benefits, Prevention of Money Laundering etc.
 - Reviewing the Council's Whistleblowing Policy
 - Developing and refreshing training and awareness activities for staff and Members to underpin an understanding of anti-fraud and corruption responsibilities.
- 1.6. A further update will be provided to Management Team and ARC in March 2023.

2. Conclusion

- 2.1. The Counter Fraud and Corruption Strategy 2023 and Action Plan are attached for ARC to note and adopt.

List of appendices: Counter Fraud and Corruption Strategy 2023 and Action Plan

Background papers: None

Corporate Implications

Legal/Constitutional: The Council has a duty to maintain an effective internal provision to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance (Regulation 5 (Part 1) of the Accounts and Audit Regulations 2015).

Financial: None

Potential impact on climate change and the environment: None

Contribution toward achieving a net zero carbon position by 2030: None

Personnel: None

Risk Management: The scope of Internal Audit activities encompasses, but is not limited to, objective examinations of evidence for the purpose of providing independent assessments to the Audit & Risk Committee, management and outside parties (e.g. External Audit) on the adequacy and effectiveness of governance, risk management, and control process for Chelmsford City Council.

Equality and Diversity: None

Health and Safety: None

Digital: None

Other: None

Consultees: Noted by Management Team November 2022

Relevant Policies and Strategies: None

CHELMSFORD CITY COUNCIL

COUNTER FRAUD AND CORRUPTION STRATEGY 2023-25

Foreword

With approximately 180,000 residents, 9400 businesses and 900 employees, Chelmsford City Council takes its responsibility as the guardians of public money very seriously. Fraud and corruption cheats the local tax payer, and impacts the recipients of the services that we strive to deliver, ultimately undermining the aims of the Council to lead by example, and help to make our society safer, greener, fairer, and better connected.

This Counter Fraud and Corruption Strategy will support the Council in its determination to take an active role in protecting itself and its residents from fraud and corruption from within and outside the organisation. We will be vigilant and advocate a zero-tolerance approach, and will seek to prevent fraud and corruption, including bribery, in all areas of our activities. Where any instances are discovered, we will take all action as is necessary to hold perpetrators to account and reduce losses to an absolute minimum. To this end, all Members, employees and those with whom we do business, have a responsibility for promoting a culture of good governance by ensuring that effective measures are in place to prevent fraud and corruption and by promptly identifying and reporting potential instances for investigation. We will be agile and work together with national agencies, the Government and other Councils to respond to new fraud threats, to prevent losses and to protect the Council finances, enabling us to maximise the value of every pound spent on behalf of local residents.

We fully commit to this Counter Fraud and Corruption Strategy as a key component in our fight against fraud and corruption.

Nick Eveleigh, Chief Executive

Cllr Nora Walsh, Chair of Audit and Risk Committee

Aim of the Counter Fraud and Corruption Strategy

The aim of this strategy is to minimise the risk of fraud and corruption and its impact, and ultimately to protect the public purse and Chelmsford City Council services for its residents.

It also ensures that the Council’s internal control measures are effective in either preventing fraud and corruption or where this isn’t possible, that a consistent and effective approach to tackling fraud and corruption is in place. Robust investigations will be undertaken in line with legislation and best practice, and appropriate action taken where necessary.

Definitions

Fraud

A person can be found criminally in breach of the [Fraud Act 2006](#) if they have acted dishonestly with the intention of making a gain for themselves or another, or causing a loss (or risk of a loss) to another by:

- False representation
- Failing to disclose information to a third party where they under a legal duty to do disclose such information
- Abuse of position, where they are expected to safeguard the financial interests of another person and abuses that position.

Other main offences under the Act include:

- Making or supplying/possession of articles for use in frauds
- Obtaining services dishonestly

Theft

The [Theft Act 1968](#) states that a person is guilty of **theft** if they dishonestly appropriate property belonging to another, with the intention of permanently depriving the other of it.

Bribery and Corruption

[Bribery Act 2010](#) defines **bribery** as financial or other advantage that is offered, given, requested or accepted with the intention of inducing or rewarding the improper performance of a relevant function. Section 7 of the Act also sets out the corporate offence of failing to prevent bribery.

The LGA defines **corruption** as the misuse of a person’s position to commit offences, which can include theft, extortion and a number of other crimes, including the soliciting of bribes. The defining characteristic of corruption is that it involves collusion between two or more individuals and is often associated with those holding public office.

Stakeholders

All of the council’s stakeholders can assist with being our first line of defence against attempts of fraud and corruption by:

- Being alert to the possibility of fraud and corruption and raise any concerns through the Council’s Whistleblowing Policy at the earliest opportunity
- Fulfilling any legal and regulatory responsibilities
- Specialist knowledge to help identify and control fraud risk
- Input into the detection and investigation of fraud
- To assist in the reduction of fraud

More detailed responsibilities are outlined in the following table:

Stakeholder	Responsibility
All employees	Comply with the Council's relevant policies and procedures including code of conduct, financial rules, procurement procedures, conflicts of interest, as well as meet standards set by professional bodies to which they belong.
Audit & Risk Committee	Approve and support the Counter Fraud Strategy and receive reports relating to the Council's Counter Fraud activity and Fraud Principal Risk, ensuring that resources are focussed on the Council's highest risk areas.
Audit Services Manager	<p>Liaise with Corporate Risk and highlight emerging fraud risks to CGG, Management Team and Audit & Risk Committee.</p> <p>Provide regular reports of Cross-Council Counter Fraud activity to Management Team and Audit & Risk Committee.</p> <p>Provide investigative services to allegations of corporate fraud.</p> <p>Develop an agile risk-based approach to internal audit coverage with consideration of fraud risks and controls in line with its Internal Audit Charter.</p> <p>Provide anti-fraud controls assurance to Management Team and Audit & Risk Committee through internal audit reporting.</p>
Cabinet Member for Fairer Chelmsford (Portfolio Holder)	Receive reports that include information, progress and barriers on the Council's assessment against the FFCL checklist, and fraud risk assessment and horizon scanning.
Chief Executive and Management Team	<p>Approve and support the Counter Fraud Strategy and receive reports relating to the Council's Counter Fraud activity and Fraud Principal Risk, ensuring that resources are focussed on the Council's highest risk areas and that the Council is measuring itself against the FFCL checklist.</p> <p>Ensure that service managers are fulfilling their anti-fraud responsibilities (see Senior Managers).</p>
Contractors and Partners	Maintain adequate systems and controls to ensure the prevention and detection of fraud and corruption.
Corporate Governance Group (CGG)	Support the Counter Fraud Strategy and receive reports relating to the Council's Counter Fraud activity and Fraud Principal Risk. Provide oversight of the Council's counter-fraud activities across all areas of the Council, including those specifically recognised as high-risk areas.
Councillors	Comply with the Council's relevant policies and procedures including constitution, code of conduct, financial rules, procurement procedures, conflicts of interest.
Digital Services and Information Governance	Deploy procedures and technical controls to minimise information security risks.

Stakeholder	Responsibility
External Audit	In line with International Standard on Auditing (UK) 240, External Audit are responsible for obtaining reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error.
Human Resources	Provide associated Council Policy and Training framework to support awareness of, and compliance with the strategy.
Monitoring Officer/Legal & Democratic Services Manager (Statutory Duty)	Local Government and Housing Act 1989 requires the Monitoring Officer to report on matters they believe to be illegal or amount to maladministration, to be responsible for the operation of the Council's constitution, and to be responsible for matters relating to the conduct of councillors and their training in relation to counter fraud awareness.
Section 151 Officer (Statutory Duty)	Section 151 of the Local Government Act 1972 requires local authorities to make arrangements for the proper administration of their financial affairs and appoint a S151 Officer, also known as a Chief Financial Officer (CFO), to have responsibility for those arrangements. Also acts as the Council's nominated Money Laundering Reporting Officer (MLRO).
Senior Managers	<p>Establish and support an anti-fraud culture in their services by ensuring employees are aware of relevant policies and procedures relating to anti-fraud and bribery, code of conduct etc, and adopting a robust control environment as well as ensuring any internal audit recommendations are implemented promptly.</p> <p>Ensure that NFI (National Fraud Initiative) data matches are reviewed and investigated, where applicable and respond to enquiries from other matched bodies. Provide mandatory fraud statistics where applicable to meet Transparency Code requirements.</p> <p>Managers of specific high-risk areas form part of CGG (see below) to ensure effective co-ordination and liaison in counter-fraud activity.</p>

PRINCIPLES AND OBJECTIVES

This strategy is based on guidance and best practice relating to fraud and corruption in the public sector including:

[CIFAS Fighting Fraud and Corruption Locally](#)

[CIPFA Code of Practice on Managing the Risk of Fraud and Corruption](#)

Providing an outline for a coordinated response to fraud and corruption perpetrated against local authorities with the support of those at the top, Fighting Fraud and Corruption Locally (FFCL) sets out **five pillars of activity**:

PROTECTING ITSELF AND ITS RESIDENTS

Recognising the harm that fraud can cause in the community. Protecting itself and its residents from fraud.

GOVERN

Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.

ACKNOWLEDGE

Accessing and understanding fraud risks.
 Committing the right support and tackling fraud and corruption.
 Demonstrating that it has a robust anti-fraud response.
 Communicating the risks to those charged with governance.

PREVENT

Making the best use of information and technology.
 Enhancing fraud controls and processes.
 Developing a more effective anti-fraud culture.
 Communicating its activity and successes.

PURSUE

Prioritise fraud recovery and use of civil sanctions.
 Developing capability and capacity to punish offenders.
 Collaborating across geographical and sectoral boundaries.
 Learning lessons and closing the gaps.

GOVERN

Those who are charged with governance support the activity by ensuring that there are robust arrangements and executive support to ensure counter fraud, bribery and corruption measures are embedded throughout the organisation.

The internal arrangements that are put in place should be communicated throughout the organisation and publicly available to demonstrate the culture and commitment to preventing fraud

Chelmsford will demonstrate this by:

- ✓ *Developing a counter fraud and corruption strategy applying to all aspects of the Council's activities which will be communicated throughout the Council and acknowledged by those charged with governance.*
- ✓ *Assessing its fraud and corruption risks, have an action plan to deal with them and regularly report to Management Team and Members.*
- ✓ *Presenting a regular report to Management Team and Audit & Risk Committee to compare against FFCL.*
- ✓ *Briefing Management Team and Audit & Risk Committee on fraud risks and mitigation.*
- ✓ *Management Team and Audit & Risk Committee supporting counter fraud work to ensure that it is appropriate in terms of fraud risk and resources.*
- ✓ *Scrutinising weaknesses revealed by instances of proven fraud and corruption and feed back to departments to fraud proof systems.*

ACKNOWLEDGE

In order to create a counter fraud response Chelmsford must acknowledge and understand fraud risks and then demonstrate this by committing the right support and appropriate resource to tackling fraud.

This means undertaking a risk assessment of fraud areas and vulnerabilities, having a plan to address it, and have access to resources with the right capabilities and skills.

Chelmsford will demonstrate this by:

- ✓ *Undertaking an assessment against the risks and horizon scanning of future potential fraud and corruption risks. This assessment will include the understanding of the harm that fraud may do in the community.*
- ✓ *Specifically considering the risks of fraud and corruption in the Council's overall risk management process.*

PROTECT

Chelmsford will protect public funds, protecting the Council from fraud and cyber-crime and also protecting itself from future frauds as well as protecting against serious and organised crime, protecting individuals from becoming victims of crime and protecting against the harm that fraud can do to the community.

Chelmsford will demonstrate this by:

- ✓ *Assessing fraud resources proportionately to the risk the Council faces and are adequately resourced.*
- ✓ *Develop a fraud plan which is agreed by Management Team and Audit & Risk Committee, reflecting resources mapped to risks and arrangements for reporting outcomes. This plan covers all areas of the Council's activities including those undertaken by contractors and third parties or voluntary sectors.*

PREVENT

Fraud can be prevented and detected by making better use of information and technology, enhancing fraud controls and processes and developing a more effective anti-fraud culture.

Chelmsford will demonstrate this by:

- ✓ *Putting in place arrangements to promote and ensure probity and propriety in the conduct of its activities and prevent and detect fraud and corruption as well as a mechanism for ensuring that this is effective and is reported to Management Team and Audit & Risk Committee.*
- ✓ *Putting in place arrangements for monitoring compliance with standards of conduct across the Council covering: Codes of conduct including behaviour for counter fraud, anti-bribery and corruption, Register of Interests, Register of gifts and hospitality.*
- ✓ *Undertaking recruitment vetting of staff prior to appointment by risk assessing posts and undertaking the checks recommended.*
- ✓ *Ensuring that there is a zero-tolerance approach to fraud and corruption and independent whistle-blowing policy which can also be accessed by contractors and third parties, is monitored for take up and can show that suspicions have been acted upon without discrimination.*
- ✓ *Consulting counter fraud staff to review new policies, strategies and initiatives across departments and this activity will be reported to Management Team and Audit & Risk Committee.*
- ✓ *Ensuring the fraud response plan covers all areas of counter fraud work and is linked to the audit plan and communicated to Management Team and Audit & Risk Committee.*
- ✓ *Ensuring that the Council actively takes part in mandatory NFI exercises and promptly takes action arising from it.*
- ✓ *Publicise successful cases of proven fraud/corruption to raise awareness.*

PURSUE

Punishing fraudsters and recovering losses by prioritising the use of civil sanctions, developing capability and capacity to investigate fraudsters and developing a more collaborative and supportive law enforcement response on sanctions and collaboration.

Chelmsford will demonstrate this by:

- ✓ *Reporting statistics maintained by the Counter Fraud team which cover all areas of activity and outcomes.*
- ✓ *Developing a programme of proactive counter fraud work which covers risks identified in the fraud risk assessment.*
- ✓ *Collaborating with other Council services and external enforcement agencies, encouraging a corporate approach and co-location of enforcement activity*
- ✓ *Undertaking prevention measures and projects using data analytics where possible*
- ✓ *Ensuring the Counter Fraud team have unfettered access to premises and documents for the purposes of counter fraud investigation.*
- ✓ *Ensuring that there are professionally trained and accredited staff for counter fraud work, with adequate knowledge in all areas of the Council and the counter fraud team has access to specialist staff for surveillance, computer forensics, asset recovery and financial investigations where required.*

ANTI-BRIBERY AND CORRUPTION

The Council will follow the guidance issued by the [Ministry of Justice](#) on compliance with the Bribery Act. In particular, it will take account of the six principles set out in the guidance as part of ensuring a robust and effective anti-bribery approach.

Proportionate Procedures

The procedures to prevent bribery by persons should be proportionate to the bribery risks faced and to the nature, scale and complexity of the Council's activities. They should also be clear, practical, accessible, effectively implemented and enforced

Top Level Commitment

Management Team are committed to preventing bribery by persons associated with the Council and to fostering a culture in which bribery is never acceptable. A report on the Bribery Act 2010 and the introduction of this policy will be approved by the Audit & Risk Committee.

Risk Assessment

The nature and extent of the Council's exposure to external and internal risks of bribery will be assessed as part of the Council's risk management process. Any risk assessment is intended to be an on-going process based on regular communication and review.

Due Diligence

A proportionate and risk-based approach will be taken in respect of persons and other organisations that perform services for or on behalf of the Council. Due diligence will include an evaluation of the background, experience and reputation of business partners. The transactions will be properly monitored, and written agreements and contracts will provide references to the Bribery Act 2010 and this policy. Reciprocal arrangements may be required for business partners to have their own policies in place. They will be advised of the Council's policy and be expected to operate at all times in accordance with such policy.

Communication (including training)

The Council will ensure that this policy and other related policies and procedures are embedded in the Council's working arrangements through appropriate communication, including training, which is proportionate to the risks the Council faces. The Council's induction programme will include reference to the Bribery Act 2010 and this policy.

Monitoring and Review

This policy, control arrangements, risk management processes and other related policies and procedures designed to prevent bribery and corruption will be monitored, reviewed and improved where necessary on a regular basis. All incidents of bribery or suspected bribery will be reported to the Audit & Risk Committee.

MONITORING AND REVIEW

Chelmsford will consider its performance against each of the following key themes in line with FFCL:

Culture – creating a culture where fraud and corruption are unacceptable

Capability – assessing the full range of fraud risks and ensuring that the range of counter fraud measures deployed is appropriate

Capacity – deploying the right level of resources to deal with the level of fraud risk that is monitored by those charged with governance

Competence – having the right skills and standards commensurate with the full range of counter fraud and corruption activity

Communication – raising awareness internally and externally, deterring fraudsters, sharing information, celebrating successes

Collaboration – working together across internal and external boundaries: with colleagues, with other local authorities, and with other agencies; sharing resources, skills and learning, good practice and innovation, and information

CHELMSFORD CITY COUNCIL

COUNTER FRAUD
AND CORRUPTION
STRATEGY
2023-25

ACTION PLAN

Action Ref	Action	Service Manager	Target Start Date	Target Completion Date
GOVERN: Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.				
G1	Develop a Counter Fraud and Corruption Strategy which will be communicated throughout the Council and acknowledged by those charged with governance.			
ABC Policy	Management Team and Audit & Risk Committee are committed to preventing bribery by persons associated with the Council and to fostering a culture in which bribery is never acceptable.			
G1.1	<i>Produce Counter Fraud and Corruption Strategy</i>	E Brooks	Nov 22	Dec 22
G1.2	<i>Review by Corporate Governance Group (CGG)</i>			Dec 22
G1.3	<i>Review and approval by Management Team</i>			Dec 22
G1.4	<i>Review and approval by Audit & Risk Committee</i>			Dec 22
G2	Assess the Council's fraud and corruption risks, have an action plan to deal with them and regularly report to Management Team and Members.			
ABC Policy	The nature and extent of the Council's exposure to external and internal risks of bribery will be assessed as part of the Council's risk management process. Any risk assessment is intended to be an on-going process based on regular communication and review.			
G2.1	<i>Undertake a detailed risk assessment of the Council's activities susceptible to fraud and/or corruption</i>	CGG	COMPLETE	COMPLETE
G2.2	<i>Review and monitor including any additional actions required.</i>	CGG	Ongoing	
G2.3	<i>Brief Management Team and Audit & Risk Committee on fraud risks and mitigation through Counter Fraud Reports and Principal Risk Register reviews (NB PRR reporting cycle is June and December).</i>	E Brooks/A Chessell	Mar-23	Sep/Mar
G3	Present a regular report to Management Team and Audit & Risk Committee to compare the Council's progress against FFCL and Counter Fraud and Corruption Strategy	E Brooks	Sep-23	March thereafter
G4	Management Team and Audit & Risk Committee review regular reports to ensure that the Counter Fraud and Corruption Strategy is appropriate in terms of its fraud risk and resources	E Brooks	Sep-23	March thereafter
G5	Scrutinise weaknesses revealed by instances of proven fraud and corruption and feed back to departments to fraud proof systems.			
G5.1	<i>Where fraud is identified, a report will be written outlining weaknesses which led to its perpetration and recommendations made to improve the control framework.</i>	E Brooks	Ad hoc	
G5.2	<i>Follow up to be undertaken to assess the progress of implementation of recommendations to assess improvement of the control framework.</i>	E Brooks	Ad hoc	

Action Ref	Action	Service Manager	Target Start Date	Target Completion Date
ACKNOWLEDGE: Accessing and understanding fraud risks; Committing the right support and tackling fraud and corruption; Demonstrating that it has a robust anti-fraud response; Communicating the risks to those charged with governance.				
A1	Undertake an assessment against the internal and external risks and horizon scan future potential fraud and corruption risks. Specifically consider the risks of fraud and corruption in the Council's overall risk management process.			
A1.1	<i>Undertake a detailed risk assessment of the Council's activities susceptible to fraud and/or corruption.</i>	CGG	COMPLETE	COMPLETE
A1.2	<i>Review and monitor including any additional actions required.</i>	CGG	Ongoing	
A1.3	<i>Brief Management Team and Audit & Risk Committee on fraud risks and mitigation through Counter Fraud Reports and Principal Risk Register reviews (NB PRR reporting cycle is June and December).</i>	E Brooks/A Chessell	Mar-23	Sep/Mar
PREVENT: Making the best use of information and technology; Enhancing fraud controls and processes; Developing a more effective anti-fraud culture; Communicating its activity and successes.				
PRE1	Put in place arrangements to promote and ensure probity and propriety in the conduct of activities and prevent and detect fraud and corruption and for monitoring compliance with standards of conduct across the Council covering: Codes of conduct including behaviour for counter fraud, anti-bribery and corruption, Register of Interests, register of gifts and hospitality, as well as a mechanism for ensuring that this is effective and reported to Management Team and Audit & Risk Committee.			
ABC Policy	The procedures to prevent bribery by persons will be proportionate to the bribery risks faced and to the nature, scale and complexity of the Council's activities. They will be clear, practical, accessible, effectively implemented and enforced, and embedded in the Council's working arrangements through appropriate communication, including training. The policy, control arrangements, risk management processes and other related policies and procedures designed to prevent bribery and corruption will be monitored, reviewed and improved where necessary on a regular basis.			
PRE1.1	<i>Remind all staff and Members of their role and responsibility in preventing and detecting fraud through promotion of the Counter Fraud and Corruption Strategy.</i>	Management Team (MT)	Apr 23	Ongoing
PRE1.2	<i>The roles within the Council (whether a Member, directly employed member of staff, agency, interim, contractor or consultant) most at risk of bribery and corruption will be identified and risk assessed by considering levels of seniority, budgetary responsibility, influences over procurement arrangements and the general nature of their duties.</i>	E Brooks	Jan-23	Mar-23
PRE1.3	<i>Remind service managers of their responsibility in monitoring these roles to ensure transparency over decision, and any conflicts or failures to disclose are managed appropriately.</i>	MT	Apr 23	Ongoing
PRE1.4	<i>Develop training and awareness activities for new staff and Members (through induction) and existing staff and Members (through refresher training) to underpin understanding of anti-fraud and corruption responsibilities.</i>	E Brooks/ K Knowles	Jan-23	Jun-23

Action Ref	Action	Service Manager	Target Start Date	Target Completion Date
PRE1.5	<i>Remind service managers of their responsibility for establishing and supporting an anti-fraud culture in their services, ensuring all their team members are aware of relevant policies and procedures relating to anti-fraud and bribery, code of conduct etc and adopting a robust control environment, including ensuring any internal audit recommendations are implemented promptly through inclusion in service plans to be monitored and actions reported locally.</i>	MT	Apr 23	Ongoing
PRE1.6	<i>Independent assurance on the effectiveness of the governance, risk management and control environment relating to fraud and corruption to be provided by Internal Audit.</i>	E Brooks	Ongoing	
PRE2	Undertake recruitment vetting of staff prior to appointment by risk assessing posts and undertaking the checks recommended.			
ABC	A proportionate and risk-based approach will be taken in respect of persons and other organisations that perform services for or on behalf of the Council.			
PRE2.1	<i>Review of Safer Recruitment procedures to ensure they mitigate fraud and corruption risks.</i>	D Wootton	TBC	TBC
PRE2.2	<i>Remind service managers of their responsibility for undertaking due diligence to evaluate the background, experience and reputation of business partners.</i>	MT	Apr 23	Ongoing
PRE2.3	<i>Written agreements and contracts will provide references to the Bribery Act 2010 and the Council's Counter Fraud and Corruption Strategy and the expectation that they will operate at all times in accordance with such policy.</i>	A Chessell	COMPLETE	COMPLETE
PRE3	Ensure that there is a zero-tolerance approach to fraud and corruption and independent whistle-blowing policy.			
ABC	All incidents of bribery or suspected bribery will be reported to Audit & Risk Committee			
PRE3.1	<i>Review Council's Whistleblowing Policy</i>	E Brooks	Jan-23	Jan-23
PRE3.2	<i>Review by CGG</i>			Feb-23
PRE3.3	<i>Review and approval by Management Team and Audit & Risk Committee</i>			Mar-23
PRE3.4	<i>Promote awareness of new Policy internally and externally</i>	MT	Apr 23	Ongoing
PRE3.5	<i>Align training to new Policy and promote refresher training</i>	E Brooks/ K Knowles	Jan-23	Jun-23
PRE3.7	<i>Whistleblowing Team respond in line with Policy and record concerns and outcomes.</i>	TBC	Ongoing	
PRE3.8	<i>Monitoring Officer will provide regular anonymised report to Governance Committee</i>	L Browne	COMPLETE	Ongoing
PRE4	Consult counter fraud staff to review new policies, strategies and initiatives across departments and this activity will be reported to Management Team and Audit & Risk Committee			

Action Ref	Action	Service Manager	Target Start Date	Target Completion Date
PRE4.1	<i>Remind service managers that new policies, procedures, strategies etc that may be connected to a fraud and/or corruption risk should be reviewed by the CGG for comments/amendments and to inform the Counter Fraud Risk Register.</i>	MT	Apr 23	Ongoing
PRE4.2	<i>CGG Counter Fraud activity will be included in the Counter Fraud Report to Management Team and Audit & Risk Committee.</i>	E Brooks	Mar-23	Sep/Mar
PRE5	Ensure the fraud response plan covers all areas of counter fraud work and is linked to the audit plan and communicated to Management Team and Audit & Risk Committee			
PRE5.1	<i>Produce Fraud Response Plan aligned to new Counter Fraud and Corruption Strategy and including specialist fraud areas i.e., Tenancy Fraud, Council Tax. Prevention of Money Laundering.</i>	E Brooks	Jan-23	Mar-23
PRE5.2	<i>Review by CGG</i>			Mar-23
PRE5.3	<i>Review and approval by Management Team and Audit & Risk Committee</i>			Mar-23
PRE5.4	<i>Promote awareness of new Fraud Response Plan internally and externally</i>	MT	Apr 23	Ongoing
PRE6	Ensure that the Council actively takes part in mandatory NFI exercises and promptly takes action arising from it.			
PRE6.1	<i>Produce an NFI operations protocol outlining roles and responsibilities for partaking in exercises, including prompt review of matches.</i>	E Brooks	Jan-23	Mar-23
PRE6.2	<i>CGG will consider if the data highlights any weakness/root causes and update Counter Fraud Risk Register accordingly.</i>	CGG	Ongoing	
PRE7	Publicise successful cases of proven fraud/corruption to raise awareness	CGG	Ad hoc	
PURSUE: Prioritise fraud recovery and use of civil sanctions; Developing capability and capacity to punish offenders; Collaborating across geographical and sectoral boundaries; Learning lessons and closing the gaps.				
PU1	Reporting statistics maintained by the Counter Fraud team which cover all areas of activity and outcomes.			
PU1.1	<i>Transparency Code and NFI statistics will be collated annually and reported to Management Team and Audit & Risk Committee</i>	E Brooks	Sep 23	Mar thereafter Annually
PU1.2	<i>Statistics will be reviewed by CGG to determine any trends/root causes and update Counter Fraud Risk Register accordingly.</i>	CGG	ongoing	
PU2	Developing a programme of proactive counter fraud work which covers risks identified in the fraud risk assessment.			

Action Ref	Action	Service Manager	Target Start Date	Target Completion Date
PU2.1	Internal Audit will align their Internal Audit Plan with Fraud Risk Assessment	E Brooks	COMPLETE	Ongoing
PU2.2	Individual audit scopes will consider the Fraud Risk assessment and consider the prevention and detection of fraud.	E Brooks	ongoing	
PU3	Collaborating with other Council services and external enforcement agencies, encouraging a corporate approach and co-location of enforcement activity			
PU3.1	CGG will continue meet quarterly in line with its terms of reference and programme of work.	E Brooks	COMPLETE	Ongoing
PU3.2	CGG Counter Fraud activity will be included in the Counter Fraud Report to Management Team and ARC	E Brooks	Sep 23	Sep/Mar
PU3.3	CGG to consider engagement plan with external agencies.	CGG	Jan 23	Mar 23
PU4	Undertake prevention measures and projects using data analytics where possible.			
PU4.1	Internal Audit to consider use of data analytics in its key financial systems review and other counter fraud work where applicable.	E Brooks	Ongoing	
PU5	Ensure that there are professionally trained and accredited staff for counter fraud work, with adequate knowledge in all areas of the Council and the counter fraud team has access to specialist staff for surveillance, computer forensics, asset recovery and financial investigations where required.			
PU5.1	Skills analysis to be undertaken by the CGG with training needs identified.	CGG	Jan-23	Mar-23
PU5.2	Training undertaken as required or identified skills gap to be considered for inclusion in the fraud risk assessment.	CGG	Jan-23	ongoing
PU5.3	CGG to consider engagement plan with external specialist support where required.	CGG	Jan 23	Mar 23
PROTECTING ITSELF AND ITS RESIDENTS: Recognising the harm that fraud can cause in the community. Protecting itself and its residents from fraud.				
PRO1	Assess fraud resources proportionately to the risk the Council faces and are adequately resourced.			
PRO1.1	Resource analysis undertaken to be undertaken by CGG with any gaps identified.	CGG	Jan-23	Mar-23
PRO1.2	Capacity gaps to be considered for inclusion in the fraud risk assessment.	CGG	Jan-23	Mar-23
PRO1.3	CGG to consider engagement plan with external support where required.	CGG	Jan-23	Mar-23
PRO2	Develop a fraud plan which is agreed by Management Team and Audit & Risk Committee, reflecting resources mapped to risks and arrangements for reporting outcomes. This plan covers all areas of the Council's activities including those undertaken by contractors and third parties			
PRO2.1	Fraud plan to be reviewed by CGG	E Brooks	Sep-23	Sep/Mar
PRO2.2	Fraud plan will be included in the Counter Fraud Report to Management Team and Audit & Risk Committee	E Brooks	Sep-23	Sep/Mar

Outstanding Actions – Action Plan (By Quarter)

Q3 (to Dec 2022)

Action Ref	Action	Service Manager
G1.1 to G1.4	<i>Produce Counter Fraud and Corruption Strategy, review by CGG, and approval from Management Team and ARC</i>	E Brooks

Q4 (Jan – Mar 2023)

Action Ref	Action	Service Manager
G2.1 & A1.1	<i>Review and update risk assessment of the Council's activities susceptible to fraud and/or corruption</i>	CGG
G2.2 & A1.2	<i>Review and monitor including any additional actions required.</i>	CGG
G2.3 & A1.3	<i>Brief Management Team and Audit & Risk Committee on fraud risks and mitigation through Counter Fraud Report</i>	E Brooks
PRE1.2	<i>The roles within the Council (whether a Member, directly employed member of staff, agency, interim, contractor or consultant) most at risk of bribery and corruption will be identified and risk assessed by considering levels of seniority, budgetary responsibility, influences over procurement arrangements and the general nature of their duties.</i>	E Brooks
PRE1.4	<i>Develop training and awareness activities for new staff and Members (through induction) and existing staff and Members (through refresher training) to underpin understanding of anti-fraud and corruption responsibilities.</i>	E Brooks/ HR
PRE3.1, 3.2, 3.3	<i>Review Council's Whistleblowing Policy, review by CGG, and approval by Management Team and Audit & Risk Committee</i>	E Brooks
PRE3.5	<i>Align training to new Counter Fraud Strategy and promote refresher training</i>	E Brooks/ HR
PRE4.2, PU3.2	<i>CGG Counter Fraud activity will be included in the Counter Fraud Report to Management Team and Audit & Risk Committee.</i>	E Brooks
PRE5.1, 5.2, 5.3	<i>Produce Fraud Response Plan aligned to new Counter Fraud and Corruption Strategy and including specialist fraud areas i.e., Tenancy Fraud, Council Tax. Prevention of Money Laundering. review by CGG, and approval by Management Team and Audit & Risk Committee</i>	E Brooks

Action Ref	Action	Service Manager
PRE6.1	<i>Produce an NFI operations protocol outlining roles and responsibilities for partaking in exercises, including prompt review of matches.</i>	E Brooks
PU2.1	<i>Internal Audit will align their Internal Audit Plan with Fraud Risk Assessment</i>	E Brooks
PU3.3	<i>CGG to consider engagement plan with external agencies.</i>	CGG
PU5.1	<i>Skills analysis undertaken to be undertaken by the CGG with training needs identified.</i>	CGG
PU5.3 and PRO1.3	<i>CGG to consider engagement plan with external support where required.</i>	CGG
PRO1.1	<i>Resource analysis to be undertaken by the CGG with any gaps identified.</i>	CGG
PRO1.2	<i>Capacity gaps to be considered for inclusion in the fraud risk assessment.</i>	CGG

Q1 (April to June 2023)

Action Ref	Action	Service Manager
PRE1.1	<i>Remind all staff and Members of their role and responsibility in preventing and detecting fraud through promotion of the Counter Fraud and Corruption Strategy.</i>	MT
PRE1.3	<i>Remind service managers of their responsibility in monitoring these roles to ensure transparency over decision, and any conflicts or failures to disclose are managed appropriately.</i>	MT
PRE1.4, PRE3.5	<i>Roll out training and awareness activities for new staff and Members (through induction) and existing staff and Members (through refresher training) to underpin understanding of anti-fraud and corruption responsibilities.</i>	E Brooks/ HR
PRE1.5	<i>Remind service managers of their responsibility for establishing and supporting an anti-fraud culture in their services, ensuring all their team members are aware of relevant policies and procedures relating to anti-fraud and bribery, code of conduct etc and adopting a robust control environment, including ensuring any internal audit recommendations are implemented promptly through inclusion in service plans to be monitored and actions reported locally.</i>	MT

Action Ref	Action	Service Manager
PRE2.2	<i>Remind service managers of their responsibility for undertaking due diligence to evaluate the background, experience and reputation of business partners.</i>	MT
PRE3.4 & 5.4	<i>Promote awareness of new Strategy, Fraud Response Plan and Whistleblowing Policy internally and externally</i>	MT
PRE4.1	<i>Remind service managers that new policies, procedures, strategies etc that may be connected to a fraud and/or corruption risk should be reviewed by the CGG for comments/amendments and to inform the Counter Fraud Risk Register.</i>	MT
PU5.2	<i>Training undertaken as required (as identified by CGG) or identified skills gaps to be considered for inclusion in the fraud risk assessment.</i>	E Brooks/ HR

Q2 (July to September 2023)

Action Ref	Action	Service Manager
G3 & G4	<i>Present a regular report to Management Team and Audit & Risk Committee to compare the Council's progress against FFCL and Counter Fraud and Corruption Strategy to ensure that the Counter Fraud and Corruption Strategy is appropriate in terms of its fraud risk and resources.</i>	E Brooks
PRE2.1	<i>Review of Safer Recruitment procedures to ensure they mitigate fraud and corruption risks.</i>	E Brooks/ D Wootton
PU1.1	<i>Transparency Code and NFI statistics will be collated annually and reported to Management Team and Audit & Risk Committee</i>	E Brooks
PU1.2	<i>Statistics will be reviewed by CGG to determine any trends/root causes and update Counter Fraud Risk Register accordingly.</i>	CGG
PU3.2	<i>CGG Counter Fraud activity will be included in the Counter Fraud Report to Management Team and Audit & Risk Committee.</i>	E Brooks
PRO2.1 & PRO2.2	<i>Fraud plan to be reviewed by CGG and included in the Counter Fraud Report to Management Team and Audit & Risk Committee.</i>	E Brooks

Ongoing

Action Ref	Action	Service Manager
G2.2 & A1.3	<i>Review and monitor including any additional actions required in Counter Fraud Risk Register.</i>	CGG
G5.1	<i>Where fraud is identified, a report will be written outlining weaknesses which led to its perpetration and recommendations made to improve the control framework.</i>	E Brooks
G5.2	<i>Follow up to be undertaken to assess the progress of implementation of recommendations to assess improvement of the control framework.</i>	E Brooks
PRE1.6	<i>Independent assurance on the effectiveness of the governance, risk management and control environment relating to fraud and corruption to be provided by Internal Audit.</i>	E Brooks
PRE3.7	<i>Whistleblowing Team respond in line with Policy and record concerns and outcomes.</i>	TBC
PRE3.8	<i>Monitoring Officer will provide regular anonymised Whistleblowing report to Audit & Risk Committee.</i>	L Browne
PRE6.2	<i>CGG will consider if the NFI data highlights any weakness/root causes and update Counter Fraud Risk Register accordingly.</i>	CGG
PRE7	<i>Publicise successful cases of proven fraud/corruption to raise awareness</i>	CGG
PU2.2	<i>Individual audit scopes will consider the Fraud Risk assessment and consider the prevention and detection of fraud.</i>	E Brooks
PU3.1	<i>CGG will continue to meet quarterly in line with its terms of reference and programme of work.</i>	CGG
PU4.1	<i>Internal Audit to consider use of data analytics in its key financial systems review and other counter fraud work where applicable.</i>	E Brooks