

Appendix B – Counter Fraud Action Plan 2022-24

Completed	16
In Progress	0
Not Started	2
TOTAL	18

#	Action	Target Date	Status
1.	To further the knowledge base of the Counter Fraud Support Officer to address single point of failure risk regarding the knowledge of the Counter Fraud Lead.	Ongoing	Complete.
2.	Biennial revision to the following counter fraud policies: - <ul style="list-style-type: none"> • Anti-Fraud & Corruption Policy • Anti-Bribery Policy • Anti-Money Laundering Policy • Policy for the Prevention of Facilitation of Tax Evasion 	November 2022	Complete.
3.	Refresh of the Council's Fraud Risk Assessment, and further development work to simplify the process.	November 2022	Complete.
4.	Develop and publish internal advice on managing the risks associated with specific areas: <ul style="list-style-type: none"> • Insider fraud • Activity-based (payment by performance) contracts 	November 2022	Complete.
5.	Issue targeted comms to key staff and departments during International Fraud Awareness Week (November each year) highlighting key fraud risk areas.	November 2022	Complete.
6.	To provide proactive counter fraud awareness raising sessions with the Council's New Starters Network, to build upon the base knowledge provided to new starters during the corporate induction process.	December 2022	Complete.
7.	To deliver fraud awareness training to School Business Managers through the (new) SBM Forum established by the C&FS department.	December 2022	Incomplete – departmental delays in establishing forum.

8.	To oversee the continued roll-out of procurement fraud training and to encourage maximum take up amongst relevant staff.	December 2022	Complete.
9.	To review the effectiveness of the newly introduced process of using the NFI Mortality Screening Service twice-yearly to identify deaths earlier in the process, particularly overseas deaths, with regard to the Local Government Pension Scheme.	December 2022	Complete.
10.	To review the effectiveness of the life certification process of assuring that pensioners living overseas remain alive.	December 2022	Complete.
11.	To understand in greater detail what products are available to the Council via its subscription to the National Anti-Fraud Network (NAFN) that can help in the prevention and detection of crime, e.g. credit searches on individuals, Land Registry searches on property ownership, General Register Office searches on deaths, etc. and to disseminate this information to relevant departments, e.g. Community Care Finance, Pensions.	December 2022	Complete.
12.	To forge closer working relationships with the Trading Standards Service to provide a collaborative approach towards fraud and scam awareness raising.	December 2022	Complete.
13.	To explore further the use of data analytics in fraud prevention, e.g. IDEA and other internal data matching techniques.	March 2023	Complete.
14.	To robustly assess 'lessons learned' coming out of special investigations and strengthen links to routine internal audit work to provide assurances to management that the risks of recurrence are minimised.	March 2023	Complete.
15.	To explore the appetite for, and feasibility of, undertaking counter fraud work surrounding school admissions, in particular surrounding the fraudulent obtaining of places at good and oversubscribed schools through the provision of false addresses.	March 2023	Complete.
16.	To co-ordinate investigations into priority matches identified by the National Fraud Initiative 2022/23 output reports (expected release date for output of Spring 2023).	March 2023	Complete.
17.	Issue targeted comms to key staff and departments during International Fraud Awareness Week (November each year) highlighting key fraud risk areas.	November 2023	Complete.

18.	Monitor changes and enhancements to the Council's processes regarding blue badge fraud resilience post the outcome of the Department for Transport (DfT) national review of blue badge fraud and councils' approaches to tackling it.	December 2023	Incomplete – DfT project put on hold.
-----	---	---------------	---------------------------------------

This page is intentionally left blank