

Fighting Fraud Checklist for Governance

Protecting the public purse 2013

November 2013

General	Yes	No
<p>1. Do we have a zero tolerance policy towards fraud?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action - Anti-Fraud Policies updated regularly</p>		
<p>2013 - Update Anti-Fraud Policies updated to include CTRS and during 2013/14 there will be a separate CTRS Anti-Fraud Policy and Prosecution policy introduced.</p>		
<p>2. Do we have the right approach, and effective counter-fraud strategies, policies and plans? Have we aligned our strategy with <i>Fighting Fraud Locally</i>?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action - Have concentrated effort on detection so only partial compliance</p>		
<p>2013 Update – Will concentrate more resources on prevention and early intervention. More resources have been diverted to non-benefit fraud</p>		
<p>3. Do we have dedicated counter-fraud staff?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action – Make up of Corporate Fraud Team has moved towards compliance as well as detection</p>		
<p>2013 Update – Evaluate effect of SFIS on Fraud Team and liaise with other external bodies further</p>		
<p>4. Do counter-fraud staff review all the work of our organisation?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action – Audit plan is based upon risk profiles and any concerns will be investigated</p>		
<p>2013 Update – Continued risk assessment and requirement for Audit Committee to oversee fraud prevention and detection</p>		
<p>5. Does a councillor have portfolio responsibility for fighting fraud across the council?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action – Constitution states responsibility for Benefit Fraud Investigation</p>		
<p>2013 Update – Request change to Constitution to fighting fraud across Council</p>		
<p>6. Do we receive regular reports on how well we are tackling fraud risks, carrying out plans and delivering outcomes?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action – Regular reporting to Audit Committee on risk strategy and emerging risks. All concerns raised under Confidential Reporting Code are reported to Audit Committee. Fraud reports given to Finance, Improvement and Property Advisory Board.</p>		
<p>2013 Update – Request changes to report fraud matters to Audit Committee in the Constitution.</p>		
<p>7. Have we assessed our management of counter-fraud work against good practice?</p>	<input type="radio"/>	<input type="radio"/>
<p>Previous action – Have carried out comparison with checklists in CIPFA</p>		

**red book, Fighting Fraud Locally and Protecting the Public Purse
annual surveys.**

2013 Update

General	Yes	No
14. Do we have effective arrangements for:		
■ reporting fraud?; and	<input type="radio"/>	<input type="radio"/>
■ recording fraud?	<input type="radio"/>	<input type="radio"/>
Previous action - Outcomes of investigation section reported to Members and press releases issued for prosecutions. Northgate system records benefit related fraud but other frauds have to be recorded manually.		
2013 Update - New Fraud Manager is considering more effective methods of recording fraud outcomes		
15. Do we have effective whistle-blowing arrangements? In particular are staff:		
■ aware of our whistle-blowing arrangements?	<input type="radio"/>	<input type="radio"/>
■ have confidence in the confidentiality of those arrangements?	<input type="radio"/>	<input type="radio"/>
■ confident that any concerns raised will be addressed?	<input type="radio"/>	<input type="radio"/>
Previous action - Confidential reporting code updated and circulated annually		
2013 Update – Annual review will take place and any concerns raised will be investigated and outcomes reported to Members		
16. Do we have effective fidelity insurance arrangements?	<input type="radio"/>	<input type="radio"/>
Previous action – Fidelity insurance in place and regularly reviewed		
2013 Update – As above		
Fighting fraud with reduced resources		
17. Have we reassessed our fraud risks since the change in the financial climate?	<input type="radio"/>	<input type="radio"/>
Previous action – All managers are required to consider fraud risk when carrying out the 6 monthly review of risk registers		
2013 Update – As above		
18. Have we amended our counter-fraud action plan as a result?	<input type="radio"/>	<input type="radio"/>
Previous action – Audit plan is a risk based plan		
2013 Update – As above		
19. Have we reallocated staff as a result?	<input type="radio"/>	<input type="radio"/>
Previous action – Audit resources are targeted at risk areas		
2013 Update – Audit resources continue to be targeted to areas of risk		

Current risks and issues	Yes	No
Housing tenancy		
20. Do we take proper action to ensure that we only allocate social housing to those who are eligible?	<input type="radio"/>	<input type="radio"/>
Previous action – Work closely with Housing to review cases identified as potentially fraudulent		
2013 Update – Continue working closely with Housing and raise fraud awareness with Housing staff		
21. Do we take proper action to ensure that social housing is occupied by those to whom it is allocated?	<input type="radio"/>	<input type="radio"/>
Previous action – Not a housing authority		
2013 Update – Have contacted main social housing provider to consider how we can joint work		
Procurement		
22. Are we satisfied our procurement controls are working as intended?	<input type="radio"/>	<input type="radio"/>
Previous action Audit review of process		
2013 Update – Audit reviews of procurement take place regularly and participation in NFI		
23. Have we reviewed our contract letting procedures since the investigations by the Office of Fair Trading into cartels, and compared them with best practice?	<input type="radio"/>	<input type="radio"/>
Previous action – Procurement OSG continually reviews procedures for contract letting		
2013 Update – Procurement OSG continues		
Recruitment		
24. Are we satisfied our recruitment procedures:		
■ prevent us employing people working under false identities;	<input type="radio"/>	<input type="radio"/>
■ confirm employment references effectively;	<input type="radio"/>	<input type="radio"/>
■ ensure applicants are eligible to work in the UK; and	<input type="radio"/>	<input type="radio"/>
■ require agencies supplying us with staff to undertake the checks that we require?	<input type="radio"/>	<input type="radio"/>
Previous action – Recruitment checks in place		
2013 Update – Audit undertaken in 2013 of recruitment has made several recommendations to ensure consistent and robust recruitment procedures		

Current risks and issues	Yes	No
Personal budgets		
25. Where we are expanding the use of personal budgets for adult social care, in particular direct payments, have we introduced proper safeguarding proportionate to risk and in line with recommended good practice?	●	●
Previous action		
2013 Update – N/A		
26. Have we updated our whistle-blowing arrangements, for both staff and citizens, so that they may raise concerns about the financial abuse of personal budgets?	●	●
Previous action		
2013 Update – N/A		
Council tax discount		
27. Do we take proper action to ensure that we only award discounts and allowances to those who are eligible?	●	●
Previous action – Participation in NFI		
2013 Update – Continued participation in NFI and introduction of CTRS in Anti-Fraud Policy and Prosecution Policy. Introduction of penalties for erroneous applications.		
Housing benefit		
28. When we tackle housing benefit fraud do we make full use of: <ul style="list-style-type: none"> ■ National Fraud Initiative; ■ Department for Work and Pensions Housing Benefit matching service; ■ internal data matching; and ■ private sector data matching? 	● ● ● ●	● ● ● ●
Previous action Participation in all of the above. Private sector data matching where cost effective to do so.		
2013 Update – Continued participation i above		

