

Anti Fraud & Corruption Framework

Specific Requirements	Date	Lead Officer	Evidence / Source Documents
Policy and Procedures			
Corporate Governance Panel undertakes an annual review of the Anti Fraud & Corruption Strategy and Whistleblowing Policy to ensure they remain relevant, up to date and cover key requirements, and amend when necessary.			
The documents are publicised and made available, and can be easily accessed by staff, members, partners, those contracting with the Council and the public.			
The Anti Fraud & Corruption Framework is updated at least annually.			
The Head of Customer Services undertakes an annual review of the Housing & Council Tax Benefit <ul style="list-style-type: none"> • Anti-Fraud Strategy and • Prosecution Policy. 			
On an annual basis, a review of activities that may be susceptible to money laundering shall be carried out and the Money Laundering Policy amended when necessary.			
Maintaining Awareness			
New employees are made aware of the Fraud & Corruption Strategy and Whistleblowing procedures.			
Fraud and corruption awareness training is provided for employees and members.			

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Reminders are issued periodically to employees about fraud/corruption/whistleblowing/money laundering.			
Demonstrate that Council staff, members, partners and contractors have confidence in the whistleblowing arrangements and are aware how to make a disclosure.			
Publicity is issued to inform residents that the Council is pro-active in identifying fraud.			
Managers who have key responsibilities for anti-fraud and corruption arrangements receive appropriate training and keep up to date with the latest developments, risks and initiatives.			
General guidance to staff shall be published via the intranet outlining their responsibilities with regard to money laundering, reporting arrangements and compliance with the Council's money laundering policy.			
Officers employed in services that are considered to be especially vulnerable to money laundering shall also receive training.			
Proactive Anti Fraud & Corruption Work			
There is a pro-active programme of counter fraud and corruption work which is adequately resourced, risk based and proportionate to the risk identified.			
Review of risk register entries highlighting fraud and corruption risks is undertaken on a regular basis. Mitigation to reduce fraud is proportionate to the risk.			

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Significant partnerships have anti-fraud and corruption arrangements in place.			
Documented procedures are in place for the notification of non-compliance with Council policies and procedures.			
Maintain, publicise and monitor confidential telephone reporting lines and other channels for whistleblowing and fraud reporting.			
The internet, application forms, license or contractual agreements contain an appropriate fair processing notification permitting data sharing for the prevention and detection of fraud and corruption.			
Appropriate arrangements for identifying and dealing with potential money laundering, are included in applicable contracts or similar agreements with external organisations.			
Internal audit prepare and maintain risk assessments that identify key systems that are susceptible to the likelihood of fraud and corruption (e.g. recruitment of staff). Reviews are undertaken on the controls operating in those systems.			
National Fraud Initiative (NFI)			
Data is provided to the NFI in accordance with published timetables.			

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NFI data matches are reviewed and follow-up work, proportionate to the risk identified, is undertaken.			
Investigations are carried out promptly. Improvements are made to systems to address any internal control weaknesses identified.			
Investigative Fraud Work			
Staff involved in investigative work are appropriately trained and maintain their skills by regular training and keep up to date with developments and legislation.			
Investigations are conducted in accordance with statutory requirements (PACE, RIPA etc).			
Investigate promptly potential cases of fraud and corruption, or pass to an appropriate external organisation (Police or DWP etc)			
Effective working arrangements are in place with other organisations (e.g. Police, DWP and HBMS). Intelligence is shared when appropriate.			
There is a policy which is applied in a consistent way, on the application of sanctions and recovering losses where fraud and corruption has been proven.			
Outcomes			

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Appropriate action is taken against those who successfully have committed, or attempted to commit, acts of fraud or corruption.			
Lessons learnt from fraud and corruption investigations are evaluated and result in the strengthening of the systems involved to reduce future opportunities.			
Action is taken to recover losses sustained, from the perpetrators of fraud and corruption (incl. use of criminal and civil law).			
Successful cases of proven fraud and corruption are publicised.			
<p>The Corporate Governance Panel receives (at least annually) reports on</p> <ul style="list-style-type: none"> • Housing Benefit Fraud investigations (including information in respect of prosecutions, administrative penalties and cautions and the active recovery of fraudulent overpayments) • Whistleblowing allegations received and outcomes • Other fraud and corruption investigations and outcomes 			
All frauds that exceed £10,000 are reported promptly to the external auditors on the appropriate form.			