Anti-Fraud & Corruption Report (2023-2024)

Oadby & Wigston Borough Council

Summary & Analysis

This report details the results of the self-assessments of the Council's anti-fraud and corruption framework and arrangements against recommended good practice detailed in:

- Local Government Counter Fraud and Corruption Strategy for the 2020s – "Fighting Fraud and Corruption Locally"

- Chartered Institute of Finance and Accountancy's (CIPFA) Code of Practice "Managing the Risk of Fraud and Corruption"

The Council's Anti-Fraud and Corruption Policy was updated and approved in June 2023.

The Policy aligned with the Fighting Fraud and Corruption Locally Guidance 2020 (FFCL 2020) which includes a checklist against which the Council's anti-fraud arrangements have been assessed.

These are detailed in **Table 1. (Page 3)**

There is one improvement recommendation identified at No. 17 which is to ensure that sign-up to the whistleblowing policy is included to contractors and third parties, which will be included within our procurement documentation, and in doing so we will increase awareness on our website.

The CIPFA's Code of Practice is designed to help organisations recognise and address their fraud risks and consists of the following five basic principles:

- Acknowledge the responsibility of the governing body for countering fraud and corruption
- Identify the fraud and corruption risks
- Develop an appropriate counter fraud and corruption strategy
- Provide resources to implement the strategy
- Take action in response to fraud and corruption

The self-assessment against the Code's requirements is detailed in **Table 2 (Page 9)**.

There are no actions for improvement identified

As part of the assessment a dedicated Anti-Fraud and Corruption Register has also been prepared. This will be reviewed regularly and reported on annually.

This is provided at **Table 3 (Page 13).**

Finally, **Table 4 (Page 31)** provides the Anti-Fraud and Corruption Activity Plan for 2024/25.

Table 1: Fighting Fraud & Corruption Locally 2020 Checklist Assessment

		Yes	Partial	No	Supporting Evidence	Action
1	The Council has made a proper assessment of its fraud and corruption risks, has an action plan to deal with them and regularly reports to its senior board and its members.	X			• The Council has developed a Fraud and Corruption Risk Register which has been reviewed for 2023/24. This will be presented to the Audit Committee July 2024.	
2	The Council has undertaken an assessment against the risks and has also undertaken horizon scanning of future potential fraud and corruption risks. This assessment includes the understanding of the harm that fraud may do in the community.	X			• An assessment has been completed for 2023/24. • Horizon scanning undertaken as part of review of fraud and corruption risk register.	
3	There is an annual report to the Audit Committee or equivalent to compare against FFCL 2020 and this checklist.	X			• Report to be presented to the Audit Committee July 2024.	
4	The relevant portfolio holder has been briefed on the fraud risks and mitigation.	X			• Briefing to be provided to the Chair of Audit Committee.	
5	The Audit Committee or equivalent supports counter fraud work and challenges the level of activity to ensure that it is appropriate in terms of fraud risk and resources.	X			• The Strategic Risk Register is regularly reported to the Audit Committee. • This report also provides a more detailed review of counter fraud activity.	
6	There is a counter fraud and corruption strategy applying to all aspects of the Council's business which has been communicated throughout the Council and acknowledged by those charged with governance.	X			• The Council's anti-fraud and corruption strategy was adopted in June 2023 and training has been provided to all staff.	
7	The Council has arrangements in place that are designed to promote and ensure probity and propriety in the conduct of its business.	X			• Officer and Member Codes of Conduct. • Gifts and hospitality register. • Declarations of interest registers.	

		Yes	Partial	No	Supporting Evidence	Action
8	The risks of fraud and corruption are specifically considered in the Council's overall risk management process.	X			• Council's fraud and corruption risk register. • Increased fraud is an identified risk on the strategic risk register.	
9	Counter fraud staff are consulted to fraud proof new policies, strategies and initiatives across departments, and this is reported upon to committee.	X			• MO and CFO sign off all formal committee reports so this is embedded within existing practice.	
10	Successful cases of proven fraud/corruption are routinely publicised to raise awareness.	X			• Publicised when they occur – No examples of non-benefit fraud during 2023/2024.	
11	The Council has put in place arrangements to prevent and detect fraud and corruption and a mechanism for ensuring that this is effective and is reported to committee.	X			• Anti-fraud and corruption strategy. • Strategic Risk Register. • Annual report to Audit Committee.	
12	The Council has put 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	X			• Regular senior management compliance checks. • Internal Audit reviews. • Monitoring Officer checks.	
13	The Council undertakes recruitment vetting of staff prior to appointment by risk assessing posts and undertaking the checks recommended.	X			• Recruitment policy and procedures.	
14	Members and staff are aware of the need to make appropriate disclosures of gifts, hospitality and business. This is checked by auditors and reported to committee.	X			• Officer and Member Codes of Conduct. • Internal Audit Plan.	
15	There is a programme of work to ensure a strong counter fraud culture across all departments and delivery	X			• Management anti-fraud and compliance checks.	

		Yes	Partial	No	Supporting Evidence	Action
	agents led by counter fraud experts.				• Annual Counter Fraud Plan.	
16	There is an independent whistle-blowing policy which is monitored for take up and can show that suspicions have been acted upon without internal pressure.	X			• Whistle-blowing procedure.	
17	Contractors and third parties sign up to the whistle-blowing policy and there is evidence of this. There should be no discrimination against whistle-blowers.		X		• Whistle-blowing procedures.	• There will be an inclusion made within our procurement documents. • We will increase awareness on the Council website.
18	Fraud resources are assessed proportionately to the risk the Council faces and are adequately resourced.	X			• Level of NFI exercises checked is based upon risk and resource availability. • OWBC's response to fraud and corruption allegations are detailed within the Anti-Fraud and Corruption Policy which is regularly reviewed. • Anti-Fraud Plan for 2024/2025. • Regular anti-fraud activities undertaken by key staff. • Internal Audit plans.	
19	There is an annual fraud plan which is agreed by committee and reflects resources mapped to risks and arrangements for reporting outcomes. This plan covers all areas of the Council's business and includes activities undertaken by contractors and third parties or voluntary sector activities.	X			• OWBC's response to fraud and corruption allegations are detailed within the Anti-Fraud and Corruption Policy which is regularly reviewed. • Anti-Fraud Plan for 2024/2025	

		Yes	Partial	No	Supporting Evidence	Action
					• Regular anti-fraud activities undertaken by key staff.	
20	Statistics are kept and reported by the fraud team which cover all areas of activity and outcomes.	X			• The MO maintains a corporate register of all fraud related activity.	
21	Fraud officers have unfettered access to premises and documents for the purposes of counter fraud investigation.	X			• OWBC's response to fraud and corruption allegations are detailed within the Anti-Fraud and Corruption Policy which is regularly reviewed.	
22	All allegations of fraud and corruption are risk assessed.	X			• OWBC's response to fraud and corruption allegations are detailed within the Anti-Fraud and Corruption Policy which is regularly reviewed.	
23	The fraud and corruption response plan covers all areas of counter fraud work.	X			• OWBC's response to fraud and corruption allegations are detailed within the Anti-Fraud and Corruption Policy which is regularly reviewed.	
24	The fraud response plan is linked to the audit plan and is communicated to senior management and members.	X			• Audit Plan includes areas of high risk and contingency which could be used if necessary for fraud and corruption investigations • Audit Plan communicated to CMT and approved by Audit Committee.	
25	Asset recovery and civil recovery is considered in all cases.	X			• This is detailed within the Anti-Fraud and Corruption Policy.	
26	There is a zero-tolerance approach to fraud and corruption which is always reported to committee.	X			• Anti-Fraud and Corruption Policy. • Financial Regulations.	
27	There is a programme of proactive counter fraud	X			• There is regular management	

		Yes	Partial	No	Supporting Evidence	Action
	work which covers risks identified in assessment.				compliance and anti-fraud checks. • Counter Fraud Plan testing.	
28	The fraud team works jointly with other enforcement agencies and encourages a corporate approach and co-location of enforcement activity.	X			• Generally captured within OWBC's response to fraud and corruption allegations which is detailed within the Anti-Fraud and Corruption Policy.	
29	The Council shares data across its own departments and between other enforcement agencies.	X			• Data is shared in accordance with legislative requirements in compliance with GDPR.	
30	Prevention measures and projects are undertaken using data analytics where possible.	X			• Annual NFI exercises.	
31	The Council actively takes part in NFI and promptly takes action arising from it.	X			• Managed through Internal Audit.	
32	There are professionally trained and accredited staff for counter fraud work.	X			• Professionally trained and experienced counter fraud staff – accredited staff are available if required through IA contract and external organisations such as Oxford Investigation Service.	
33	The counter fraud team has adequate knowledge in all areas of the Council.	X			• Finance Team and Internal Audit experience and knowledge.	
34	The counter fraud team has access to specialist staff for surveillance, computer forensics, asset recovery and financial investigations.	X			• This is available as necessary.	
35	Weaknesses revealed by instances of proven fraud and corruption are scrutinised carefully and fed back to departments to fraud proof systems.	X			• Management checking and Internal Audit reporting process – although no cases identified 2023/2024.	

		Yes	Partial	No	Supporting Evidence	Action
36	The counter fraud team has registered with the Knowledge Hub so it has access to directories and other tools.	X			• Senior Finance Officers are registered with Hub.	
37	The counter fraud team has access to the FFCL regional networks.	X			• Access via Hub.	

CIPFA's Code of Practice "Managing the Risk of Fraud and Corruption"

The self-assessment against the Code's requirements, with the results detailed in Table 2 below.

There are no actions for improvement identified.

Table 2: CIPFA Code of Practice Managing the Risk of Fraud & Corruption Assessment

1. Acknowledge the responsibility of the governing body for countering fraud and corruption

The governing body should acknowledge its responsibility for ensuring that the risks with fraud and corruption are managed effectively across all parts of the organisation.

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action
1.1	The Council's leadership team 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	X			- Anti-Fraud and Corruption Policy - Financial Regulations - Strategic Risk Register	
1.2	The Council's leadership team acknowledge the importance of a culture that is resilient to the threats of fraud and corruption and aligns to the principles of good governance	X			- Anti-Fraud and Corruption Policy - Strategic Risk Register - Annual Governance Statement - Financial Regulations	
1.3	The Council acknowledges its responsibility for ensuring the management of its fraud and corruption risks and will be accountable for the actions it takes through its governance reports	X			- Anti-Fraud and Corruption Policy - Annual Governance Statement - Financial Regulations	
1.4	The Council sets a specific goal of ensuring and maintaining its resilience to fraud and corruption and explores opportunities for financial savings from enhanced fraud detection and prevention	X			- Management anti-fraud and compliance checks - Counter Fraud Plan testing	

2. Identify the fraud and corruption risks

Fraud risk identification is essential to understand specific exposures to risk, changing patterns in fraud and corruption threats and the potential consequences to the organisation and its service users

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action

		Yes	Partial	No	Supporting Evidence	Action
2.1	Fraud risks are routinely considered as part of the Council's risk management arrangements	X			• Anti-Fraud periodically reviewed and reported as part of the Strategic Risk Review • Annual review of the Fraud and Corruption Risk Register	
2.2	The Council identifies the risks of corruption and the importance of behaving with integrity in its governance framework	X			• Anti-Fraud periodically reviewed and reported as part of the Strategic Risk Review • Annual review of the Fraud and Corruption Risk Register	
2.3	The Council uses published estimates of fraud loss, and where appropriate its own measurement exercises, to aid its evaluation of fraud risk exposures	X			• Published fraud loss estimates are taken into account to aid the evaluation of the fraud risk exposure (EG Cyber Crimes)	
2.4	The Council evaluates the harm to its aims and objectives and service users that different fraud risks can cause	X			• Anti-Fraud periodically reviewed and reported as part of the Strategic Risk Review • Annual review of the Fraud and Corruption Risk Register	

3. Develop an appropriate counter fraud and corruption strategy

A Council needs a counter fraud strategy setting out its approach to managing its risks and defining responsibilities for action

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action
3.1	The Council formally adopts a counter fraud and corruption strategy to address identified risks and align with the Council's acknowledged responsibilities and goals	X			• Anti-Fraud and Corruption Policy	
3.2	The strategy includes the Council's use of joint working or partnership approaches to managing its risks, where appropriate	X			• Anti-Fraud and Corruption Policy	
3.3	The strategy includes both proactive and responsive approaches that are best suited to the Council's fraud and corruption risks	X			• Anti-Fraud and Corruption Policy	
3.4	The strategy includes clear identification of	X			• Anti-Fraud and Corruption Policy	

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action
	responsibility and accountability for delivery of the strategy and for providing oversight					

4. Provide resources to implement the strategy

The Council should make arrangements for appropriate resources to support the counter fraud strategy

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action
4.1	An annual assessment of whether the level of resource invested to counter fraud and corruption is proportionate for the level of risk	X			• Fraud and Corruption Risk Register • Report to Audit Committee on Fraud Plan for 2024/25	
4.2	The Council utilises an appropriate mix of experienced and skilled staff, including access to counter fraud staff with professional accreditation	X			• Professionally trained and experienced counter fraud staff – accredited staff are available if required through IA contract and external organisations such as Oxford Investigation Service.	
4.3	The Council grants counter fraud staff unhindered access to its employees, information and other resources as required for investigation purposes	X			• Financial Regulations	
4.4	The Council has protocols in place to facilitate joint working and data and intelligence sharing to support counter fraud activity	X			• Data sharing protocols • Implementation of GDPR arrangements	

5. Take action in response to fraud and corruption

The Council should put in place the policies and procedures to support the counter fraud and corruption strategy and take action to prevent, detect and investigate fraud

	CIPFA Requirement	Yes	Partial	No	Supporting Evidence	Action
5.1	The Council has put in place a policy framework which supports the implementation of the counter fraud strategy	X			• Anti-Fraud and Corruption Policy • Financial Regulations • Whistle-blowing procedures and code. • Codes of Conduct • Cyber Security Policy • Declarations of Interest	

					• Gifts and Hospitality register	
5.2	Plans and operations are aligned to the strategy and contribute to the achievement of the Council's overall goal of maintaining resilience to fraud and corruption	**X**			• Fraud and Corruption Response Plan	
5.3	Making effective use of national or sectoral initiatives to detect fraud or prevent fraud, such as data matching or intelligence sharing.	**X**			• NFI exercises	
5.4	Providing for independent assurance over fraud risk management, strategy and activities	**X**			• Lead officer is the CFO / S151	
5.5	There is a report to the governing body at least annually on performance against the counter fraud strategy and the effectiveness of the strategy from the lead person designated in the strategy. Conclusions are featured in the annual governance report	**X**			• Annual Report to the Audit Committee	

Fraud and Corruption Risk Register

The Fraud and Corruption Risk Register has been established and verified to ensure that it continues to accurately reflect the fraud and corruption risks being faced by the Council and the controls and actions required to mitigate them to an acceptable level.

The Council's Counter Anti-Fraud Plan is fully aligned with this register.

Table 3 - Fraud & Corruption Risk Register - June 2024

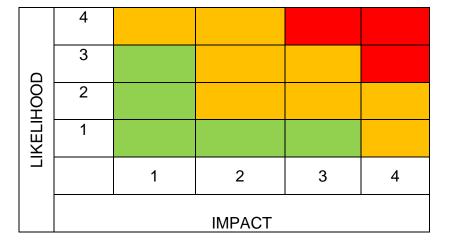| Risk No.	Risk Area	Current Risk Rating	Target Risk Rating
1.	Procurement / Contracts	2 (Low)	2 (Low)
2.	Recruitment / Selection / Attendance	2 (Low)	2 (Low)
3.	Payroll	2 (Low)	2 (Low)
4.	Debt Management	2 (Low)	2 (Low)
5.	Creditor Payments	2 (Low)	2 (Low)
6.	Financial and Treasury Management	3 (Low)	3 (Low)
7.	Stocks & Assets	2 (Low)	2 (Low)
8.	Declaration of Interests / Gifts and Hospitality	2 (Low)	2 (Low)
9.	Data Management	4 (Medium)	4 (Medium)
10.	Money Laundering	1 (Low)	1 (Low)
11.	Tenancy / Right To Buy Fraud	2 (Low)	2 (Low)
12.	Benefit Fraud	6 (Medium)	6 (Medium)
13.	Insurance	1 (Low)	1 (Low)
14.	Council Tax / Business Rates	6 (Medium)	6 (Medium)
15.	Bank Mandate	2 (Low)	2 (Low)
16.	Planning Regime	3 (Low)	3 (Low)

Definition of Fraud: "Dishonest conduct with the intention to make a gain or cause a loss or the risk of a loss to another"

Definition of Corruption: "Offering, giving, soliciting or accepting of an inducement or reward which influences a person to act against the interests of the organisation or the proper conduct of their duties"

Likelihood 1 = Almost Impossible (< 5%) 2 = Unlikely (5 – 35%) 3 = Likely (36 – 75%) 4 = Almost certain (>75%)	
1 = Low / Negligible Impact e.g. • Minor service disruption • Minimal financial loss	**2 = Medium Impact e.g.** • Service disruption • Moderate financial loss which can be accommodated from within existing budgets • Adverse local media coverage
3 = High Impact e.g. • Significant service disruption • Major financial loss which will have a significant impact on the MTFP • Adverse national media coverage	**4 = Catastrophic Impact e.g.** • Total service loss for a significant period • Severe financial loss with reserves unlikely to be available • Government intervention in running services

Risks that are scored between 1 and 3 are considered to be Low, between 4 and 9 are Medium and between 12 and 16 are considered to be High.

The risk scores can be plotted onto the risk matrix, see below, which assists in determining the risk priority and the attention required Tolerance.

Fraud & Corruption Risk Ref: 1

Fraud & Corruption Risk Area: Procurement / Contracts

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Cartel operations by contractors (price fixing) • Business case / specification favours one contractor • Improper award of contract • Contracts not delivered properly • Contract cost over run • Inducements offered • Favourable terms on leases / agreements given	• Excessive costs incurred • Fraud • Corruption • Bribery • Reputational damage • Police involvement • Legal proceedings • Legal action against the Council • Adverse media coverage • Financial loss	• Compliance with Contract & Procurement Regulations and Guidance • Contracts Register • Use of contractor frameworks • Supervision, authorisation & management structures • Training • Anti-Fraud checks • Budget monitoring • Anti-Bribery Policy & Procedure • Whistle-blowing Code	1	2	2 Target Risk Rating 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst the Whistle-blowing Code is available to all, specific reference will be provided within procurement documentation.	Q2	Corporate Project, System & IT Manager
Whilst this is a low risk, testing will be undertaken during 2024/25.	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Fraud & Corruption Risk Ref: 2

Fraud & Corruption Risk Area: Recruitment / Selection / Attendance

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Identity fraud • Qualification fraud • False references • Favouritism • Appointment of unauthorised employees • Non-disclosure of a criminal record • No right to work in the UK • Employees working whilst on sick leave • Falsifying time management system • Home-working – employees not working	• Fraud • Reduced productivity • Work not to required standard • Safeguarding issues • Health & Safety risks • Police involvement • Legal proceedings • Reputational damage • Legal sanction	• Compliance with recruitment & attendance management policies & procedures • Training • Compliance with Disclosure and Barring reporting policy • National Fraud Initiative (NFI) data matching • Whistle-blowing Code • Checks on flexi time records • Compliance with agile working policy • Anti-fraud checks by management • General management / supervisory controls • Internal Audit testing	1	2	2 Target Risk Rating 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25.	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Fraud & Corruption Risk Ref: 3

Fraud & Corruption Risk Area: Payroll

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Creation of ghost employees • Unauthorised payroll adjustments • Unauthorised payments to leavers • Falsified timesheets / overtime claims • Falsified travel and subsistence claims • Out of date employee details including contracts	• Fraud • Financial loss • Reputational damage • Police involvement • Legal proceedings	• Payroll system access controls • Compliance with Financial Regulations • Confirmation of establishment lists • Payroll system controls • Payroll reconciliations • Whistle-blowing Code • Internal Audit reviews • Budget monitoring • Management authorisation controls • Independent valuations • Anti-fraud checks • All new starters are introduced to SLT	1	2	2 Target Risk Rating 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Internal Audit of Payroll and Expenses	Q4	Internal Audit

Fraud & Corruption Risk Ref: 4

Fraud & Corruption Risk Area: Debt Management

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Failure to raise a debtor account • Unauthorised amendments to debtor accounts • Improper write-offs • Improper suppressing of debt recovery action • Falsifying refunds	• Fraud • Corruption • Bribery • Loss of income • Police involvement • Legal proceedings • Reputational damage • Adverse media coverage	• Compliance with Financial Regulations • Management / supervisory controls • Budget monitoring • Performance monitoring re debt collection • IT system access controls • Write-off authorisation controls • Internal Audit reviews • Whistle-blowing Code • Anti-Fraud checks	1	2	2 Target Rating 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Fraud & Corruption Risk Ref: 5

Fraud & Corruption Risk Area: Creditor Payments

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Invoices paid for goods / services not received • Invoices paid for goods / services for personal gain • Fictitious creditors set up • Falsification of invoices • Inflated invoices • Improper coding	• Fraud • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with Financial Regulations • IT system controls including separation of duties • System access controls • Budget monitoring • BACS processing controls • NFI data matching • Internal Audit review • Anti-fraud checks • Whistle-blowing Code	1	2	2 Target Risk Register 2

Actions For Improvement	Target Date for completion	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Risk & Corruption Ref: 6

Fraud & Corruption Risk Area: Financial and Treasury Management

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Fraudulent repayment / investment by Council employee • Misappropriation of funds	• Fraud • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with Financial Regulations • Compliance with Treasury Mgt Policies & Procedures • Compliance with Investment Strategy • Authorisation controls / separation of duties • Insurance cover • Anti-fraud checks • Internal Audit Financial Management Reviews	1	3	3 Target Risk Register 3

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)
Further work to be undertaken to look at the separation of duties regarding journals/approvals and whether this can be automated.	By Q2	Finance Manager & Deputy S151

Fraud & Corruption Risk Ref: 7

Fraud & Corruption Risk Area: Stocks & Assets (including land)

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Misappropriation of stock by Council employees or others • Theft of fuel / misuse of fuel cards • Theft / misuse of assets • Inappropriate / unauthorised disposal of assets for personal gain • Inappropriate / unauthorised use of Council vehicles	• Fraud • Theft • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with Financial Regulations • Management / Supervisory controls • Stock checking procedures • Fuel monitoring • Compliance with fuel card procedures • Budget monitoring • Internal Audit review • Whistle-blowing Code • Vehicle logs • Anti-fraud checks	1	2	2 Target Risk Register 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Fraud & Corruption Risk Ref: 8

Fraud & Corruption Risk Area: Declaration of Interests / Gifts & Hospitality

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Failure to declare private work / other interests • Failure to declare / accept inappropriate gifts for preferential treatment	• Corruption • Bribery • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with members & Employees Codes of Conduct • Declaration of Interests requirements • Bribery Act Policy & Procedure • Whistle-blowing Code • Internal Audit checks • Monitoring Officer checks	2	1	2 Target Risk Register 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
No additional actions required		

Fraud & Corruption Risk Ref: 9

Fraud & Corruption Risk Area: Data Management

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Abuse of email / internet • Abuse/misuse of personal or corporate information • Theft / misuse of IT equipment	• Breach of Data Protection Act • Fines from Information Commissioner • Theft • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with IT Policies & Procedures • Management / Supervisory controls • Compliance with Members & Employees Codes of Conduct • Compliance with GDPR Policies & Procedures • IT system access controls • Restricted access to internet sites • IT inventory checks • Whistle-blowing Code • Anti-fraud checks	2	2	4 Target Risk Register 4

Actions For Improvement	Target Date for Implementation	Officer Responsible
IT Governance Health Check scheduled 2024/25	Q4	Internal Audit

Fraud & Corruption Risk Ref: 10

Fraud & Corruption Risk Area: Money Laundering

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Use of the Council to hide improper transactions to launder money illegally	• Criminal offence • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Anti-Money Laundering Policy & Procedure • Upper limits for cash transactions • Training for relevant employees	1	1	1 Target Risk Register 1

Actions For Improvement	Target Date for Implementation	Officer Responsible
No additional actions required		

Fraud & Corruption Risk Ref: 11

Fraud & Corruption Risk Area: Housing Tenancy

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Sub-letting of properties for personal gain	• Fraud • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Home visits (at least annually) • Photographic evidence of tenants checked • Signatures of tenants checked • Anti-fraud checks • NFI	2	1	2 Target Risk Register 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Housing Rent Audit scheduled for 2024/25	Q2	Internal Audit

Fraud & Corruption Risk Ref: 12

Fraud & Corruption Risk Area: Benefit Fraud

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Claimant fraudulently claims benefit • Fraudulent claim by third party • Fraudulent claim by Member / employee	• Fraud • Reputational damage • Financial loss • Legal proceedings • Adverse media coverage	• SFIS • Verification framework • Training • Fraud hotline • NFI & data matching • Benefit Subsidy Claim Verification Checks	3	2	6
					Target Risk Register 6

Actions For Improvement	Target Date for Implementation	Officer Responsible
Benefit fraud investigations are carried out by the DWP. Potential single person discount fraud is investigated by the Council's Benefits Team		

Fraud & Corruption Risk Ref: 13

Fraud & Corruption Risk Area: Insurance

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Fraudulent claims • Duplicate claims at other organisations • Over claiming	• Fraud • Reputational damage • Potential increases in insurance premiums • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Insurance Officer checks claims • NFI	1	1	1 Target Risk Register 1

Actions For Improvement	Target Date for Implementation	Officer Responsible
No additional actions required		

Fraud & Corruption Risk Ref: 14

Fraud & Corruption Risk Area: Council Tax / Business Rates

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Exemptions / Discounts claimed fraudulently • Fictitious refunds • Suppressing arrears	• Fraud • Reputational damage • Financial loss • Legal proceedings • Adverse media coverage	• Reviews of single person discount entitlement • NFI & data matching • Internal Audit reviews • Fraud hotline • Management & system controls • Review of suppressed recovery action	3	2	6 Target Risk Register 6

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151 (in conjunction with Service Manager)

Fraud & Corruption Risk Ref: 15

Fraud & Corruption Risk Area: Bank Mandate Fraud

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Inappropriate / Unauthorised changes made to bank account details	• Fraud • Reputational damage • Financial loss • Police involvement • Legal proceedings • Adverse media coverage	• Compliance with Financial Regulations • Authorised signatories • Internal Audit review	1	2	2 Target Risk Register 2

Actions For Improvement	Target Date for Implementation	Officer Responsible
Whilst this is a low risk, testing will be undertaken during 2024/25	By Q4	Finance Manager & Deputy S151

Fraud & Corruption Risk Ref: 16

Fraud & Corruption Risk Area: Planning Regime

1 Trigger	2. Consequence	3. Existing Controls	Likelihood	Impact	Risk Rating to Date
• Bribery of planning officers • Bribery of committee members • Unethical relationship with developers • Inadequate enforcement procedures • Conflicts of interest	• Reputational damage • Financial loss • Prosecution e.g. Health & Safety	• Planning Procedures • Delegated approvals require PO to confirm no conflict of interests, • Effective enforcement action • Whistle-blowing Code • Member & Officer Codes of Conduct • Training • Recruitment Checks • Management controls • Up to date Planning Enforcement Policies	1	3	3 Target Risk Register 3

Actions For Improvement	Target Date for completion	Officer Responsible
No additional actions required		

Table 4: Proposed Anti-Fraud and Corruption Plan for 2024/2025

The following table of activities provide the proposed Anti-Fraud and Corruption Plan for 2024/25.

Ref	Action	Lead officer(s)
1	To undertake publicity campaigns to promote the Council's counter-fraud and corruption policies and procedures, with particular emphasis upon whistleblowing	CFO & MO
2	To ensure the delivery of fraud and corruption awareness training including e-learning in liaison with HR	CFO
3	To manage the National Fraud Initiative (NFI) data matching exercises including the review and investigation of relevant matches in accordance with agreed protocols	CFO (in conjunction with Head of Internal Audit)
4	To perform horizon scanning of emerging fraud and corruption risks and respond to new / revised CIPFA or Fighting Fraud Locally guidance	CFO & MO
5	To consider nationally publicised fraud and corruption cases and assess the risk for the Council	CFO & MO
6	To deliver the agreed schedule of risk assessed management counter fraud and corruption checks	Heads of Service
7	To ensure that relevant sections of the Council's Intranet and Internet sites relating to counter fraud and corruption are kept up to date	Finance Manager & Deputy S151
8	To carry out an annual review of the effectiveness of the Council's counter fraud and corruption arrangements and report findings	CFO
9	To review fraud and corruption alerts from the National Anti-Fraud Network and investigate as appropriate	Finance Manager & Deputy S151
10	To carry out in depth checking of transactions in areas identified in the Council's Anti-Fraud & Corruption Register.	Finance Manager & Deputy S151 (in conjunction with Service Manager).
11	To carry out any non-benefit related fraud or corruption investigations	CFO & MO