



UTTLESFORD DISTRICT COUNCIL COUNTER FRAUD AND CORRUPTION STRATEGY 2024-2026

ACTION PLAN

Objectives

Action Ref	Action	Responsibility	Initial Target Date	Current Position	Revised Target Date	RAG Rating
1	Develop an enhanced fraud response plan that clearly delineates between a preliminary evaluation to determine the substance of any case and a subsequent full investigation. There should be a defined decision point which may lead to full investigation (with a view to civil or criminal action) closure (as nothing to investigate). The fraud response plan should clearly identify who will be carrying out any investigations and where the budget sits.	Audit Manager / Monitoring Officer / s151 Officer	March 2025	This work was initially delayed due to other Internal Audit work priorities and has been further scaled back because of the Local Government Review triage process. It will be reviewed again as resources allow and the current fraud response plan will remain in place.	March 2026	●
2	Update the risk assessment of the Council's activities susceptible to fraud and / or corruption risks to bring it in line with the Council's revised risk management policy (due to be agreed by Cabinet in October 2024).	Audit Manager / Counter-Fraud Working Group	September 2025	The counter-fraud working group agreed to adapt Essex CC's fraud risk assessment for UDC. This will be trialed in HR (for recruitment fraud). Methodology will then be rolled out across the rest of the Council.	September 2025	●
3	Develop a system for recording all the Council's counter-fraud activity, capturing savings and providing appropriate summary reports to Audit and Standards Committee.	Audit Manager	March 2025	Reporting included in this report.	N/A	●
4	Develop an on-line training module for use by all staff and Members and existing staff and Members to underpin understanding of anti-fraud and corruption responsibilities.	Audit Manager / Monitoring Officer / HR	November 2024	A test version of the module has been shared with the counter-fraud working group. Suggestions for improvement have been passed on to the developer and it is anticipated that the module will go live in May 2025.	May 2025	●
5	Provide all members and officers with anti-bribery and anti-money laundering training.	Audit Manager / Monitoring Officer / HR	June 2025	Following on from the counter fraud training course, the next phase will be to develop a training course for anti-bribery and anti-money laundering. This will be modeled with a similar format to counter-fraud.	November 2025	●
6	Identify and provide specific training needs for front-line staff who act as gatekeepers to Council services.	Counter Fraud Working Group	Ongoing	This will be ad-hoc, an opportunistic where actions are identified.	Ongoing	●

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7	Investigate the potential use of CIFAS as a provider of training, in recruitment vetting and in preventing tenancy fraud.	Audit Manager / HR	March 2025	This has been discussed with the Head of HR, who is content that the current recruitment and vetting processes are appropriate. Due to the Local Government Review triage process, this will not be considered at this time	N/A	●
8	Targeted campaign to address the fraud risk in one more areas of Council activity.	Counter Fraud Working Group	September 2025	As a result of the Local Government Review triage process, this will be scaled back and reviewed in conjunction with the work of our partnering authorities.	March 2026	●
9	Investigate the potential use of new technologies to ensure account names correspond with bank account numbers and sort codes prior to making payment.	ICT / Finance	December 2025	Complete	N/A	●
10	Provide support and guidance across the community to help residents and stakeholders protect themselves against fraud, and advice on how to refer their concerns to appropriate bodies when fraud occurs.	Counter Fraud Working Group	December 2025 / Ongoing	Current processes for reporting fraud will continue to be developed and where we can provide signposting for residents / businesses we will.	Ongoing	●

Ongoing Actions

Action Ref	Action	Responsibility	Current Position
1	Report to Audit and Standards Committee on counter-fraud activity and progress against the counter-fraud activity and action plan.	Audit Manager / Counter-Fraud Working Group	Annual Report to the May Audit & Standards Committee. Mid-year report planned for November.
2	Ensure that the Council actively takes part in mandatory NFI exercises and promptly takes action arising from it.	Audit Manager / Counter-Fraud Working Group	Currently 21/860 matches have been reviewed. In April 2025 the CFWG agreed a timetable to review the remaining matches.
3	Where fraud is identified, a report will be written outlining weaknesses which led to its perpetration and recommendations made to improve the control framework. Follow up to be undertaken to assess the progress of implementation of recommendations to assess improvement of the control framework.	Audit Manager	Will take place as required.
4	Fraud risk is considered by Internal Audit in the development of the Internal Audit Annual Plan and within relevant audit assignments.	Audit Manager	Included in the 2025/26 Audit Plan
5	Update counter-fraud policies and procedures in line with the updated guidance and changes within the Council (e.g. due to Blueprint Uttlesford.	Audit Manager / Counter Fraud Working Group	Will review as appropriate
6	The Counter-Fraud Working Group will meet quarterly in line with its terms of reference and programme of work.	Audit Manager / Counter Fraud Working Group	CFWG met in April 2025. Plan for meetings in July, October & January
7	Maintain information governance and cyber security measures that protect our data from cyber-criminals.	ICT	Ongoing