

Appendix 1: Pro-Active Anti-Fraud Plans 2015/16 to 2017/18

Pro-Active Anti-Fraud Plan 2015/16

Activity	Action	Estimated Resources	Expected Outcome	Financial Implication	Priority
Fraud Awareness Strategy & Training Material - Review & Re-launch	Use Survey Monkey Questionnaires to cross-section of approx. 100 staff, different grades & depts to assess retention of fraud awareness training. Review & refresh training material - eLearning, hand-out & Members fraud awareness. Consider scope of training for Comensura temps and consultants (CS & DBE) Re-launch fraud awareness training on LMS (being launched by HR early 2015).	20 Days	Embedded fraud awareness strategy. Up-skilled & resilient workforce. Training material remains relevant and ensures current fraud risks are covered.	Nil – Anti-Fraud Manager (AFM) activity	High
CIPFA Code of Practice; Managing the Risk of Fraud & Corruption.	Benchmark against the code to ensure the City's response to counter fraud is in-line with recommendations. Statement to be made on City's counter fraud response within Annual Governance statement.	5 Days	City's response to counter fraud is aligned with CIPFA code, and assurance provided to Committee. Statement included within Annual Governance Statement.	Nil - AFM activity	High
National Fraud Initiative 2014/15	Participation in 2014/15 NFI exercise. Manage City Corporation & City Police involvement in exercise. Ensure key activities completed to NFI timetable. Ensure matches resulting from NFI exercise are promptly reviewed and appropriate actions taken, supporting colleagues as appropriate.	60 Days	Fraud & Error identified and appropriate action taken. Identification of fraud risk areas. Publication of successful outcomes where appropriate. Where no, or a low level of instances are returned, a level of assurance to be taken over anti-fraud controls in place. .	Cost of mandatory exercise: CoL £2,100 CoL-P £1,500 Possible C&CS legal charges where criminal/ civil action is necessary.	High
Cyber Fraud Risk Assessment	Pan organisation review of cyber fraud risks and mitigating activities. Joint review with IS Senior Auditor. Understand where risks exist across CoL Take appropriate action/ make recommendations where cyber fraud risks are identified.	10 Days	Actions taken to mitigate cyber fraud in areas of vulnerability. Risks better understood. Increased awareness of cyber fraud risks across the CoL	Nil - AFM & Senior IS Auditor activity.	High

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Anti-Fraud & Corruption Strategy Review	Review content to ensure it remains relevant and up-date as necessary. Include Proceeds of Crime Act (POCA) activity for CoL to be included within Policy. Agree changes to strategy with BSD & HARM. Present any changes to strategy to Committee as necessary, gaining Member support. Re-launch Strategy on intranet.	7 Days	Up-dated and refreshed strategy, with content that remains relevant and includes POCA response to fraud.	Nil - AFM activity	Medium
Business rates fraud risks - review and scope for anti-fraud & pro-active fraud detection activity.	Liaison with Head of Revenues & Business Rates Manager to understand business rates fraud risks in the City. Understand exemptions and impact on CoL. Review inspection regime and effect of SBR on this activity, consider risks arising from this. Scope, present and undertake pro-active anti-fraud exercises.	10 Days	Identification of business rates fraud in City. Income generation opportunities. Mitigation of business rates fraud in CoL.	AFM/ FI activity. Possible C&CS legal charges where criminal/ civil action is necessary.	Medium
Procurement fraud risks - review and scope for anti-fraud & pro-active fraud detection activity.	Joint working with Internal Audit Contract Audit Team. Liaison with Head of City Procurement to understand any procurement fraud risks affecting the City. Understand controls in place within City Procurement to mitigate against procurement fraud. Consider, scope, present and undertake pro-active anti-fraud exercises, working in consultation with Procurement and Contract audit team.	10 Days	Identification of procurement fraud risks at CoL. Mitigation of procurement fraud at CoL. Building awareness and resilience to fraud in this area.	AFM/ FI activity. Possible C&CS legal charges where criminal/ civil action is necessary.	Medium

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<p>Home Office Immigration Enforcement Team - joint working exercise - no right to work.</p>	<p>Undertake pro-active exercise to identify those employees that may not have the right to work. Areas considered to be low pay, manual labour with historical risks of such fraud - cleaners/ security staff/ gardeners etc.</p>	<p>15 Days</p>	<p>Identification of employees with no right to work. Prompt action taken where such fraud is identified. Positive awareness of such pro-active exercises at CoL. Assurance of strong control and checking regime should no or limited staff be identified.</p>	<p>AFM to co-ordinate exercise. Need to be aware that such an exercise may identify those with no right to work - cover will be necessary, along with HR support and action.</p>	<p>Medium</p>
<p>Disabled parking permit fraud - policy and pro-active exercises</p>	<p>Liaison with CoL Parking Services to consider scope of any activity in this area. Visits to other London Boroughs, review of disabled parking fraud activity undertaken in those boroughs. Consider appropriate sanction and prosecution options. Draft disabled parking permit anti-fraud & investigation policy for agreement with Business Support Director & Head of Audit. Consider whether formal policy required for Committee approval. to gain support & endorsement. Scope, present and undertake pro-active anti-fraud exercises.</p>	<p>10 Days</p>	<p>Robust and clear disabled parking permit anti-fraud policy, endorsed by committee. Reduce abuse of disabled parking permit fraud within the City of London. Take appropriate action where necessary. Free up disabled parking bays for those in greatest need.</p>	<p>Fraud Investigator (FI) activity. Possible C&CS legal charges where criminal/ civil action is necessary.</p>	<p>Low</p>
<p>Council Tax & Council Tax Support Fraud - Anti-Fraud & Investigation Policy</p>	<p>Liaison with CT Manager to review risks of CT fraud and also within the CTS scheme. Consider outcomes from CT NFI exercise to direct CT fraud risks. Consider appropriate sanction and prosecution options. Draft CT/ CTS anti-fraud & prosecution policy for agreement with Business Support Director &</p>	<p>10 Days</p>	<p>Robust and clear CT/ CTS anti-fraud policy, endorsed by committee. Mitigate against & reduce CT / CTS fraud. Take appropriate action where necessary. Increased revenue from CT receipts (from drop in CT discounts/</p>	<p>AFM/ FI activity. Possible C&CS legal charges where criminal/ civil action is necessary.</p>	<p>Low</p>

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	Head of Audit. Present policy to Committee to gain support & endorsement. Scope, present and undertake pro-active anti-fraud exercises.		exemptions and CTS claims.		
Employee to Directorship Fraud Drive	Identify employees who have interests in private companies. Identify employees who have failed to declare employment outside of CoL, contrary to the City's Code of Conduct. Data-matching against Companies House data. Scope for joint working with HR.	10 Days	Identify where there may be a conflict of interest. Take action to mitigate against risks associated with conflicts of interest where/ if identified. Appropriate HR action necessary dependant on findings.	FI activity. Data-matching costs expected to be between £500 & £1000.	Low
Fraud Manual Review	Review content to ensure it remains relevant and up-date as necessary.	7 Days	Up-dated, user friendly fraud manual, with content that remains relevant	Nil - AFM activity	Low
Total		180 Days			

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Pro-Active Anti-Fraud Plan 2016/17

Activity	Action	Estimated Resources	Expected Outcome	Financial Implication	Priority
Fraud Awareness Strategy & Training Material Review	Review training material - eLearning, hand-out & Members fraud awareness. Up-date where necessary. Review completion of the training by CoL staff against iTrent reports.	10 Days	Embedded fraud awareness strategy. Up-skilled & resilient workforce. Training material remains relevant and ensures current fraud risks are covered.	Nil - AFM activity	High
Whistleblowing Policy Review	Review City's whistleblowing policy, updating as appropriate.	3 Days	Policy remains up-to-date and consistent with any changes to whistleblowing practice & procedures.	Nil - AFM activity	High
National Fraud Initiative 2016/17	Participation in 2016/17 NFI exercise. Manage City Corporation & City Police involvement in exercise. Ensure key activities completed to NFI timetable. Ensure matches resulting from NFI exercise are promptly reviewed and appropriate actions taken, supporting colleagues as appropriate.	60 Days	Fraud & Error identified and appropriate action taken. Identification of fraud risk areas. Publication of successful outcomes where appropriate. Seek assurance from areas with minimal matches returned.	Cost of mandatory exercise: CoL £2,100 CoL-P £1,500 (costs may increase 2014 charges quoted) Possible C&CS legal charges where criminal/ civil action is necessary.	High

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<p>Credit Reference Agency - Social Housing Fraud Drive</p>	<p>Follow on from successful CRA fraud drive in 2013. City housing tenant data matched against CRA credit reference data. Consideration to be given to tailoring fraud drive to arrears including mortgage account holders, and/or, properties where no credit record exists.</p>	<p>60 Days</p>	<p>Identification of illegal sub-letting across CoL housing estates. Identification of fraudulent Right to Buy discounts. Allows City to provide housing to those in needs. Demonstrates robust approach to tenancy fraud at CoL. POCA activity to be considered in all cases.</p>	<p>AFM & FI Exercise. Data matching exercise estimated £2,000. Possible C&CS legal charges where criminal/ civil action is necessary.</p>	<p>High</p>
<p>Insurance fraud risks - review and scope for anti-fraud & pro-active fraud detection activity.</p>	<p>Liaison with Insurance Fraud Manager - Chamberlains to review the value of insurance claims against CoL (self insured/ covered by policy), particularly for trips and falls etc. (generally low/ medium value claims), understanding level of claims paid out and investigation activity undertaken in response to such claims. Scope, present and undertake pro-active anti-fraud exercises.</p>	<p>10 Days</p>	<p>Identification of fraudulent insurance claims submitted to the CoL. Mitigation of future Insurance fraud. Building awareness and resilience to grant fraud. Consider scope for checking validity of claims with IFB.</p>	<p>AFM activity. Possible C&CS legal charges where criminal/ civil action is necessary. Possible scope to check claims with IFB</p>	<p>Medium</p>
<p>Grant fraud risks - review and scope for anti-fraud & pro-active fraud detection activity.</p>	<p>Liaison with Chief/ Deputy Chief Grants Officer - CBT to review the inherent risks of grant fraud, considering as part of this, frauds that have come to light and been investigated by IA in recent years. Understand the mitigating actions that are in place within CBT to reduce the risks of fraud. Consider use of external data-matching to identify fraud/ fraud risk (CIFAS) Scope, present and undertake pro-active anti-fraud exercises.</p>	<p>10 Days</p>	<p>Identification of fraudulent grant applications from outset. Identification of and suspension of grant payments currently in payment as appropriate. Mitigation of future grant fraud. Building awareness and resilience to grant fraud.</p>	<p>AFM activity. Possible C&CS legal charges where criminal/ civil action is necessary. Possible use of external data, such as CIFAS.</p>	<p>Medium</p>

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Duplicate Payments Exercise	Last exercise undertaken 2009 with private firm on a commission basis - low level of duplicate payments identified. Review level of duplicate payments identified by City Procurement and NFI data-matching. Consider scope for Oracle R12 undertaking duplicate payment identification exercise post implementation in February 2015. Identify private sector partner, agree scope and fees - develop, present and undertake pro-active exercise.	10 Days	Identification of previously unknown duplicate payments. Income generation. Positive awareness activity for City Procurement staff. Assurance of low level of duplicate payments at CoL.	Commission on identified duplicate payments expected to be approximately 25%. AFM to co-ordinate exercise.	Medium
CIPFA Code of Practice; Managing the Risk of Fraud & Corruption.	Benchmark against the code to ensure the City's response to counter fraud is in-line with recommendations. Statement to be made on City's counter fraud response within Annual Governance statement.	5 Days	City's response to counter fraud is aligned with CIPFA code, and assurance provided to Committee. Statement included within Annual Governance Statement.	Nil - AFM activity	Medium
RIPA Policy Review	Review CoL RIPA Policy.	5 Days	Ensure Policy remains up to date and fit for purpose. Necessary amendments to policy made. Changes to Policy notified to Committee for approval.	Nil - AFM activity	Medium

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Review of central gifts and hospitality register	Review and evaluate the extent at which the register is being utilised, whether it is fit for purpose, and the nature of the items/ activities declared.	2 Days	Identification of areas where registration of gifts and hospitality is not being holistically undertaken. Review may Identify fraud and/or corruption where further investigation is necessary.	Nil – FI activity	Low
Total		175 Days			

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Pro-Active Anti-Fraud Plan 2017/18

Activity	Action	Estimated Resources	Expected Outcome	Financial Implication	Priority
Fraud Awareness Strategy & Training Material Review	Review training material - eLearning, hand-out & Members fraud awareness. Up-date where necessary. Review completion of the training by CoL staff against iTrent reports.	10 Days	Embedded fraud awareness strategy. Up-skilled & resilient workforce. Training material remains relevant and ensures current fraud risks are covered.	Nil – Anti-Fraud Manager (AFM) activity	High
CIPFA Code of Practice; Managing the Risk of Fraud & Corruption.	Benchmark against the code to ensure the City's response to counter fraud is in-line with recommendations. Statement to be made on City's counter fraud response within Annual Governance statement.	5 Days	City's response to counter fraud is aligned with CIPFA code, and assurance provided to Committee. Statement included within Annual Governance Statement.	Nil - AFM activity	High
Cyber Fraud Risk Assessment	Pan organisation review of cyber fraud risks and mitigating activities. Follow-up from 2015/16 exercise Joint review with IS Senior Auditor. Understand and identify where cyber risks exist across CoL. Take appropriate action/ make recommendations where cyber fraud risks are identified.	10 Days	Actions taken to mitigate cyber fraud in areas of vulnerability. Risks better understood. Increased awareness of cyber fraud risks across the CoL	Nil - AFM & Senior IS Auditor activity.	High

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National Fraud Initiative 2016/17	Participation in 2016/17 NFI exercise. Manage City Corporation & City Police involvement in exercise. Ensure key activities completed to NFI timetable. Ensure matches resulting from NFI exercise are promptly reviewed and appropriate actions taken, supporting colleagues as appropriate.	60 Days	Fraud & Error identified and appropriate action taken. Identification of fraud risk areas. Publication of successful outcomes where appropriate. Seek assurance from areas with minimal matches returned.	Cost of mandatory exercise: CoL £2,100 CoL-P £1,500 Possible C&CS legal charges where criminal/civil action is necessary.	High
Business rates fraud risks - review and scope for anti-fraud & pro-active fraud detection activity.	Follow-up from 2015/16 exercise, Liaison with Head of Revenues & Business Rates Manager to review actions and activities from 2015/16 exercise. Plan, present and undertake pro-active anti-fraud exercises.	10 Days	Identification of business rates fraud in City. Income generation opportunities. Mitigation of business rates fraud at CoL.	AFM/ Fraud Investigator (FI) activity. Possible C&CS legal charges where criminal/civil action is necessary.	Medium
Anti-Fraud & Corruption Strategy Review	Review content to ensure it remains relevant and up-date as necessary Agree changes to strategy with BSD & HARM. Present any changes to strategy to Committee as necessary, gaining Member support. Re-launch Strategy on intranet.	5 Days	Up-dated and refreshed strategy, with content that remains relevant.	Nil - AFM activity	Medium

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<p>Housing Rents to Direct Debit Fraud Drive</p>	<p>Identify sub-letting and non-resident activity by comparing direct debit instructions against tenant data. Take appropriate action where suspected sub-letting has been identified. Publicise successful outcomes.</p>	<p>10 Days</p>	<p>Identification of sub-letting across CoL housing estates. Robust action taken where illegal sub-letting is found. Recovery of property and/ or criminal action under Fraud Act 2006 or POSHFA 2013.</p>	<p>FI activity. Possible C&CS legal charges where criminal/ civil action is necessary.</p>	<p>Low</p>
<p>Fraud Manual Review</p>	<p>Review content to ensure it remains relevant and up-date as necessary.</p>	<p>5 Days</p>	<p>Up-dated, user friendly fraud manual, with content that remains relevant</p>	<p>Nil - AFM activity</p>	<p>Low</p>
<p>Disabled parking permit fraud - policy and pro-active exercises</p>	<p>Review of Policy and activities from 2015/16 exercise. Consider whether policy, actions and activities remain fit for purpose, recommending changes as appropriate. Review pro-active anti-fraud exercises, making recommendations for fresh approaches where necessary. .</p>	<p>10 Days</p>	<p>Robust and clear disabled parking permit anti-fraud policy, endorsed by committee. Reduce abuse of disabled parking permit fraud within the City of London. Take appropriate action where necessary. Free up disabled parking bays for those in greatest need.</p>	<p>FI activity. Possible C&CS legal charges where criminal/ civil action is necessary.</p>	<p>Low</p>

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Contingency	Contingency element to deal with new and emerging risks in 2017/18. Resources to be deployed on a risk basis agreed by ARMC and the Chamberlain.	50 Days	To be determined when planning decisions on deployment of resources are made.	Nil – Contained within existing resources	low
Total		180 Days			