

## Appendix 1 - Pro-active Anti-Fraud Plan 2012/13

Activity	Action	Desired Outcome	Estimated Resources	Who	When	Progress
<a href="#">Protecting the Public Purse 2011</a> - Checklist for those responsible for governance	Review of Organisations response to fraud against AC check list	Gain a greater understanding of how the organisation views and responds to fraud. Identify areas for improvement Outcome of review reported within Strategic Anti-Fraud report to Audit & Risk Committee in June 2012	Benchmarking exercise undertaken by the Senior Investigator, with the results utilised to inform our Pro-active Anti-fraud strategy.	Chris Keesing Matt Lock Paul Nagle	Q1	Completed.
Fraud Awareness E-learning	Review of Corporate package held on L&D <a href="#">corezone</a> - and re-designed to fit CoL purposes. CK to be given editing privileges for e-learning package, with support from L&D – Corporate HR. Chief Officer support required for package to become mandatory for completion by staff across the organisation	Development of e-learning package planned for Q1. Senior Management/ Chief Officer agreement Q2. Roll out of fraud awareness e-learning package Q2 – Q3 Aim to Increase staff awareness of fraud Provide staff with a way to check their understanding of the topic Undertake learner evaluation Establish areas for pro-active fraud drives.	Initial review by Senior Investigator, Agreement of scope (content & target audience) with Risk & Assurance Manager. Head of Audit, Business Support Director & Chamberlain Senior Investigator & L&D to edit content Roll out of e-learning by L&D	Chris Keesing Sabir Ali Paul Nagle HR L&D	Q1 – Q4	E-learning completed and presented to COG in March 2013.

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Fraud Awareness Presentations	Analysis of service areas suitable for fraud awareness, possibly driven from the evaluation of e-learning. Methodology to be reviewed and improved to increase the benefits of presentations – questionnaires/ evaluation Tailored Fraud Awareness sessions to be undertaken at Departmental request, or when need identified following fraud investigation/ audit review.	Action plan for delivery of fraud awareness presentations, possibly feeding into Corporate induction Increase staff awareness of fraud at all levels across the organisation Understand employee's views of fraud and how they feel the City responds.	Analysis by Senior Investigator Review by Risk & Assurance Manager Scope agreed with business units Delivery of Fraud Awareness sessions by Senior Investigator	Chris Keesing Paul Nagle CoL Depts.	Q1 – Q4 (and upon request)	Three Fraud Awareness Presentations given, positive feedback received from all.
Data Matching against CIFAS National Fraud Database (NFD)	Free trial match of housing rents/ options data, housing benefits data, CT SPD data, disabled parking permit data against the CIFAS NFD	Identify CoL customers who may have made fraudulent applications/ claims with external organisations, such as banks, insurance companies etc. CIFAS outcomes data to be regarded as intel. Any matched persons to be considered for additional investigation.	Senior Investigator to agree data matching principles, and gather required data from relevant service delivery areas Senior Investigator to correspond with CIFAS, agree timetable, and exchange data. Senior Investigator to review returns, and investigate individual matches	Chris Keesing Paul Nagle	Q3 – Q4	Deferred due to priority given to sensitive investigations.

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Housing Rents/ Allocations Fraud Drive	Undertake review of the social housing provision provided by the City of London	To identify instances where employees have abused the social housing provision provided by the City of London, this includes abuse by employees when making applications and possible abuse of process by staff when assessing housing applications and allocating City of London social housing	Senior Investigator to propose Fraud Drive and agree scope with Risk & Assurance Manager & Head of Audit Field work and data to be checked by Senior Investigator / Internal Auditor's Investigations to be undertaken by Senior Investigator/ Internal Auditor's	Chris Keesing/ Joseph Lee	Q3 - Q4	Completed – no frauds identified providing assurance of adherence to Policy & Procedures.  Minor recommendations made to up-date data held locally on tenant's files.
National Fraud Initiative – NFI	To actively participate in Audit Commission (AC) 2012/13 NFI exercise Ensure CoL is compliant with NFI principles, data sets, FPN's, timetable etc.	To identify areas for concern, where fraud or error may exist To investigate matches received Take appropriate action where fraud & error is found Positive publicity for CoL	Senior Investigator – Key Contact, will liaise with AC, and be responsible for compliance with datasets, FPN's, timetable etc. Data matches to be investigated by Internal Audit staff and Departmental NFI contacts across the organisation	Chris Keesing Paul Nagle CoL Dept. NFI contacts	Q2 onwards	NFI Data submissions successfully completed. NFI matches released by AC on 29/01/2013. Positive progress made progressing instances identified by AC.