

## Chamberlain's Department – Internal Audit - Pro-active Anti-Fraud Plan 2013/14 – Appendix 2

Activity	Action	Desired Outcome	Estimated Resources	Who	When	Progress
<a href="#">Protecting the Public Purse 2012</a> - Checklist for those responsible for governance	Review of the City's response to fraud against AC check list	<ul style="list-style-type: none"> <li>Gain a greater understanding of how the organisation views and responds to fraud.</li> <li>Identify areas for improvement</li> </ul>	Benchmarking exercise undertaken by the Senior Investigator- results utilised to inform our Pro-active Anti-fraud strategy.	Chris Keesing	June 2013	
Fraud Awareness 'Spot it, Stop it' campaign.	Week long Fraud Awareness campaign, promoted by the National Fraud Authority and CIPFA, utilising the 'Spot it Stop it' tool kit available on the CIPFA TIS web-site..	<p>Aims;</p> <ul style="list-style-type: none"> <li>Targeted fraud awareness campaign to all CoL employees</li> <li>Increased fraud awareness across organisation, along with increased awareness and confidence in City's whistleblowing arrangements</li> <li>Increase profile of City's anti-fraud and investigation unit.</li> <li>Enforce our zero tolerance approach to fraud &amp; corruption</li> <li>Supporting full roll out of fraud awareness e-learning and other awareness activity</li> </ul>	<p>Chief Officer support from TC &amp; Chamberlain, along with Business Support Director.</p> <p>Chris Keesing to co-ordinate campaign</p> <p>Support for delivery from Paul Nagle, Sabir Ali and Internal Audit staff.</p> <p>Support from Internal Comms Team and HR.</p>	Chris Keesing	Autumn 2013 (commencing Sept 2013)	

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Fraud Awareness Presentations	Continuation of tailored fraud awareness presentations to internal and external forums	<ul style="list-style-type: none"> <li>• Increase staff awareness of fraud at all levels across the organisation</li> <li>• To undertake fraud awareness activity in areas where investigations have been undertaken or fraud and/or corruption has been found.</li> <li>• Understand employee's views of fraud and how they feel the City responds.</li> </ul>	<ul style="list-style-type: none"> <li>• Senior Investigator will continue to lead and co-ordinate fraud awareness presentations, with support of the Head of Audit &amp; Risk &amp; Assurance Manager.</li> </ul>	Chris Keesing Paul Nagle Sabir Ali	Where need identified or agreed, and where requested during the reporting year.	
Housing Rents to Direct Debit Payments exercise	Undertake data-matching activity to identify instances where CoL Social Housing may be sub-let. This will be done by identifying those tenants whose rent payments are made by a person not associated with the tenancy.	<ul style="list-style-type: none"> <li>• The identification of suspect sub-letting fraud</li> <li>• The recovery of those properties from tenants found to be sub-letting</li> <li>• Criminal Action and positive publicity in suitable cases.</li> </ul>	<ul style="list-style-type: none"> <li>• Senior Investigator to propose scope of, and oversee Fraud Drive</li> <li>• Internal Auditor/ Fraud Investigator to undertake data-matching &amp; field work</li> <li>• Senior Fraud Investigator/ Fraud Investigator to investigate and determine suitable action.</li> </ul>	Chris Keesing Internal Auditor assistance to undertake key role in fraud drive DCCS C&CS	Commence July 2013	

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National Fraud Initiative – NFI	<p>Active participation in AC's 2012/13 NFI exercise.</p> <ul style="list-style-type: none"> <li>Co-ordinate &amp; ensure all recommended filter matches are reviewed in a timely fashion.</li> <li>Investigate all matches where fraud and/or error identified.</li> <li>Liaise with AC where necessary and co-ordinate any AC inspection.</li> </ul>	<ul style="list-style-type: none"> <li>To identify areas for concern, where fraud or error may exist</li> <li>To investigate and take suitable action in instances where matching activity has found fraud &amp; error</li> <li>Publicise successful prosecutions from NFI activity</li> <li>Receive positive report from AC NFI inspection as in previous exercises</li> </ul>	<p>Senior Investigator – Key Contact, will be responsible for:</p> <ul style="list-style-type: none"> <li>Liaison with AC.</li> <li>NFI compliance.</li> <li>Co-ordination of review of matches by staff in owning areas.</li> <li>Effective investigation and publicity in fraud cases arising from NFI activity.</li> </ul>	<p>Chris Keesing</p> <p>CoL Dept. NFI contacts</p>	On-going across reporting year.	
Employee to Directorship fraud drive exercise	<p>Undertake fraud drive, with assistance of external partner (Tracesmart Solutions) in order to identify employees that may be undertaking work which may not have been declared in-line with Corporate Policy. Employee data will be matched against Companies House Data held by Tracesmart Solutions</p>	<ul style="list-style-type: none"> <li>Identification of CoL employees who have failed to declare employment outside of CoL duties, which may impact on employees performance at CoL</li> <li>Identify whether there are any undeclared conflicts of interest between employees and creditors.</li> </ul>	<p>Estimated cost of data-matching £600</p> <p>Senior Investigator to propose and co-ordinate fraud drive.</p> <p>Support required from Head of Audit &amp; Business Support Director</p> <p>Investigations to be undertaken by Senior Investigator, fraud Investigator and Internal Auditors</p>	<p>Chris Keesing</p> <p>Internal Auditor assistance to undertake key role in fraud drive</p> <p>Human Resources</p> <p>C&amp;CS</p>	Commence November 2013	