

Appendix 1 – Four Key Pillars

Govern



- The City's senior leaders are responsible for ensuring anti-fraud, bribery and corruption measures are embedded throughout the organisation.
- Those charged with governance will receive clear and effective communications about the fraud risks faced by the City and recommendations to reduce any exposure to fraud.
- The City will maintain and publicise policies and procedures that demonstrate its organisational commitment to integrity and ethical business, to act as an effective fraud deterrent.
- The City will conduct regular evaluations to provide objective feedback on the effectiveness of both the investigation process and the anti-fraud and corruption strategy."

Acknowledge



- The City identifies, acknowledges and understands its fraud risks through a programme of fraud risk assessments, and demonstrates this by committing the right support and appropriate resource for tackling fraud.
- Continuously assess those areas most vulnerable to the risk of fraud as part of our fraud risk management activity. These fraud risk assessments will inform our internal counter fraud controls and counter fraud priorities.
- Strengthen measures to prevent fraud. The Counter Fraud team will work with our internal partners such as management, Housing, HR, Finance, Legal, Corporate Policy and external partners, to ensure new and existing systems and policy initiatives reduce the risk of fraud.
- Raise awareness through a series of campaigns and the publication of fraud successes in local and national media, including using all forms of social media..

Prevent



- Make best use of data and analytical software to prevent and detect fraudulent activity. We will look for opportunities to share data and fraud intelligence to increase our capability to uncover potential and actual fraud.
- Promote and develop a strong counter fraud culture, raise awareness, provide a fraud e-learning tool and provide information on all aspects of our counter fraud work.
- Promote sound counter fraud controls and processes to mitigate the risks of fraud across the city's breadth of activities, by considering a broad spectrum of potential fraud schemes and risk exposures, and recommending improvements where necessary.
- Maintain and develop a proactive data analysis capability.
- Promote a culture where staff feel empowered to report any genuine suspicions of fraudulent activity.

Respond



- Applying appropriate and effective sanctions for individuals or organisations where an investigation identifies fraudulent activity. This may include legal action, criminal and/or civil or disciplinary action, where appropriate.
- Maintain professional counter fraud resource to investigate suspected or directed fraud & corruption.
- Align our counter fraud response to fraud risks faced by the City Corporation.
- Work with the Public Sector Fraud Authority, the Police, local Councils and other enforcement agencies to continue building strong partnerships and strengthen the City's response to fraud and corruption.
- Innovate & collaborate with London Boroughs to tackle cross boundary fraud through the London Fraud Hub, enabling the City to identify fraud at an early stage and the identification of fraud at the point of application
- Develop and share good practices and lessons learned from all aspects of counter-fraud activity