

Appendix 1: Summary of delivery against the 2013/14 proactive anti-fraud plan

| Activity | Action | Desired Outcome | Estimated Resources | Who | When | Progress |
|---|---|--|---|--|-----------|---|
| Protecting the Public Purse (PPP) 2012 - Checklist for those responsible for governance | Review of the City's response to fraud against AC check list | <ul style="list-style-type: none"> Gain a greater understanding of how the organisation views and responds to fraud. Identify areas for improvement | Benchmarking exercise undertaken by the Senior Investigator- results utilised to inform our Pro-active Anti-fraud strategy. | Chris Keesing | June 2013 | PPP 2012 checklist considered against review from PPP 2011, no notable changes required to governance arrangements in place at CoL. |
| Fraud Awareness E-learning | <p>Fraud Awareness E-learning training course developed and produced by CK during 2012/13.</p> <p>Hard copy Fraud Awareness handout produced for those employees with little or no access to IT.</p> <p>E-learning to be agreed by Chief Officers for roll-out.</p> <p>Completion of training expected by all CoL employees</p> | <ul style="list-style-type: none"> Communication to employees to commence May/ June 2013 via Intranet/ eLeader Roll-out to commence 1st July 2013. Completion of course by 01/11/2013 Aims to up-skill CoL employees and give them the confidence to report concerns. | <p>Senior Investigator to co-ordinate E-learning.</p> <p>Support required from HR, Head of A&RM.</p> <p>Training to be endorsed by Chief Officers and Members of A&RM Committee</p> | Chris Keesing Paul Nagle HR L&D | Q1 – Q4 | E-learning completed by in excess of 95% of CoL employees as at Jan 2014. This training has provided employees with the necessary skills to notice the warning signs of fraud that could affect the CoL, and has provided guidance to staff about raising concerns. |

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| 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"> • Targeted fraud awareness campaign to all CoL employees • Increased fraud awareness across organisation, along with increased awareness and confidence in City's whistleblowing arrangements • Increase profile of City's anti-fraud and investigation unit. • Enforce our zero tolerance approach to fraud & corruption • Supporting full roll out of fraud awareness e-learning and other awareness activity | <p>Chief Officer support from TC & 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) | Deferred – the fraud awareness e-learning programme, detailed in the previous objective has superseded this activity during this current reporting year. |

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| Fraud Awareness Presentations | Continuation of tailored fraud awareness presentations to internal and external forums | <ul style="list-style-type: none"> Increase staff awareness of fraud at all levels across the organisation To undertake fraud awareness activity in areas where investigations have been undertaken or fraud and/or corruption has been found. Understand employee's views of fraud and how they feel the City responds. | <ul style="list-style-type: none"> Senior Investigator will continue to lead and co-ordinate fraud awareness presentations, with support of the Head of Audit & Risk & Assurance Manager. | Chris Keesing Paul Nagle Sabir Ali | Where need identified or agreed, and where requested during the reporting year. | <p>Fraud Awareness presentations delivered to;</p> <p>Housing Benefit staff – Oct 2013</p> <p>Housing Allocations staff – Oct 2013 & Feb 2014.</p> |
| 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"> The identification of suspect sub-letting fraud The recovery of those properties from tenants found to be sub-letting Criminal Action and positive publicity in suitable cases. | <ul style="list-style-type: none"> Senior Investigator to propose scope of, and oversee Fraud Drive Internal Auditor/ Fraud Investigator to undertake data-matching & field work Senior Fraud Investigator/ Fraud Investigator to investigate and determine suitable action. | Chris Keesing Internal Auditor assistance to undertake key role in fraud drive DCCS C&CS | Commence July 2013 | Deferred – due to significant audit and fraud investigator resource involved in major investigation. |

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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"> Co-ordinate & ensure all recommended filter matches are reviewed in a timely fashion. Investigate all matches where fraud and/or error identified. Liaise with AC where necessary and co-ordinate any AC inspection. | <ul style="list-style-type: none"> To identify areas for concern, where fraud or error may exist To investigate and take suitable action in instances where matching activity has found fraud & error Publicise successful prosecutions from NFI activity Receive positive report from AC NFI inspection as in previous exercises | <p>Senior Investigator – Key Contact, will be responsible for:</p> <ul style="list-style-type: none"> Liaison with AC. NFI compliance. Co-ordination of review of matches by staff in owning areas. Effective investigation and publicity in fraud cases arising from NFI activity. | <p>Chris Keesing</p> <p>CoL Dept. NFI contacts</p> | <p>On-going across reporting year.</p> | <p>Positive endorsement of City's involvement in the NFI received from the AC.</p> <p>4 Frauds and 6 Errors have been identified as a direct result of this exercise, resulting in overpayments of £11,726.65</p> |
| 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"> Identification of CoL employees who have failed to declare employment outside of CoL duties, which may impact on employees performance at CoL Identify whether there are any undeclared conflicts of interest between employees and creditors. | <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 & 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&CS</p> | <p>Commence November 2013</p> | <p>Deferred to 2014/15 – funding was provided for an alternative, higher priority fraud drive – Housing Tenants to Credit Reference Agency data-matching.</p> |