

Appendix 2: Pro-active Anti-Fraud Plan for the 2014/15 reporting year

Activity	Action	Desired Outcome	Estimated Resources	Who	When	Progress
Protecting the Public Purse 2013 - Checklist for those responsible for governance	Review of the City's response to fraud against AC check list. Consider whether City's Anti-Fraud and Corruption Strategy is still fit for purpose, and whether a full review is required	<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.	CK SA	20/06/2014 – review of Protecting the Public Purse 30/11/2014 – if update to Anti-Fraud and Corruption Strategy required.	
Members Fraud Awareness Session	Fraud Awareness Session to be delivered to all Members of the City Corporation declaring an interest. Scope to be planned by CK & PN and agreed with SCJ. Session expected to be interactive and cover areas of specific interest to Members that may affect the CoL. Session to last a maximum of one hour.	<ul style="list-style-type: none"> Session to be publicised to Members with expressions of interest sought Session to cover areas of fraud risk that may affect the CoL Members gain a better understanding of the anti-fraud & investigation work undertaken by Internal Audit Feedback from Members welcomed to help shape and inform the direction of the teams anti-fraud activities 	CK & PN to consider scope and agree with SCJ Power Point presentation to be developed by CK and agreed with PN & SCJ Presentation to be delivered to Internal Audit colleagues at team meeting prior to delivery to Members – comments considered and incorporated as appropriate. Presentation delivered to Members.	CK PN SCJ SA	23/06/2014	

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Credit Reference Agency (CRA)-social housing fraud drive	Data-matching exercise undertaken with major CRA in order to identify tenants who may be sub-letting their properties or who have obtained property by deception through furnishing false or misleading information concerning their circumstances.	<ul style="list-style-type: none"> Identify illegal occupation of CoL social housing Identify fraudulently obtained social housing Recover property illegally occupied/obtained. Prosecute offenders where appropriate Reduce pressure on City's TA and waiting list Return quality housing to those in greater housing need. 	<p>Director support for funding fraud drive</p> <p>CK to manage fraud drive and liaise with CRA.</p> <p>Referrals to be reviewed by LC & CK</p> <p>Investigations to be undertaken by LC & CK</p> <p>CK & PN to review cases identified for further action.</p> <p>C&CS to support and administer civil & criminal investigations referred by IA Investigations Team</p>	CK LC PN C&CS	Fraud drive commenced Autumn 2013. Referrals from fraud drive to have a major impact on resource for 2014/15, and expected to continue through reporting year.	<p>Excellent level of buy-in from relevant Depts.</p> <p>Several successful outcomes already obtained.</p>

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Document/ Fraud Awareness Interactive Training Session	<p>Joint CoL/ UKBA document & fraud awareness interactive session designed to up-skill CoL staff responsible for verifying personal identity documents requested for key services and employment to verify right to work and or recourse to public funds.</p> <p>Target audience:</p> <ul style="list-style-type: none"> • Housing Benefit Staff • Housing Tenancy Staff • Rents Staff • Front Line Staff • Estates Staff • HR Staff • Trading Standards Staff 	<ul style="list-style-type: none"> • Increase staff awareness of fraud affecting CoL • Increase document fraud awareness for CoL staff involved in verification of personal documents • To mitigate fraudulent applications being successful. • To continue in our aims to reduce fraud across the CoL 	<ul style="list-style-type: none"> • Senior Investigator will lead and co-ordinate fraud/ document awareness training session, with support from Fraud investigator. • UKBS liaison to provide specialist document awareness training aspect of training session 	CK LC	20/05/2014	

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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. 	CK Internal Auditor assistance to undertake key role in fraud drive DCCS C&CS	15/09/2014	

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National Fraud Initiative – NFI 2014/15 Exercise	<p>Active participation in AC’s 2014/15 NFI exercise, as per set timetable and instruction.</p> <ul style="list-style-type: none"> • Co-ordinate & arrange for Fair Processing Notices (FPN’s) to be issued as appropriate • Co-ordinate and arrange for data to be extracted as appropriate. • Facilitate safe and secure transfer of data to AC as per instruction. • Maintain liaison with NFI Team and act as Key Contact form CoL. • Ensure key personnel are aware of their responsibilities in relation to the NFI and are prepared to undertake investigative activity as appropriate. • Ensure CoL data-set users are set-up on NFI secure web-site and able to review matches. 	<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 • Where a minimal number of matches have been returned by the AC, take a degree of assurance, as appropriate that fraud risk is low in particular area. Feed this back to fraud & risk teams. • 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 FPN’s, data-sets, extraction and up-load of data, review of matches by staff in owning areas. • Effective investigation and publicity in fraud cases arising from NFI activity. 	<p>CK CoL Depts. NFI contacts</p>	<p>TBC (expected Oct 2104)</p>	

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Employee to Directorship fraud drive exercise	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	<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, and fraud Investigator</p>	<p>CK</p> <p>LC</p> <p>Human Resources</p> <p>C&CS</p>	08/12/14	