

Devon County Council

Devon Audit Partnership

End of Year Report

Audit Committee June 2023



Support, Assurance and Innovation

1. Introduction

- 1.1 The Counter Fraud Services Team within <u>Devon Audit Partnership</u> (DAP) continues to support and facilitate the development of the Council's Counter Fraud processes and capability to improve its resilience to fraud and related offences.
- 1.2 The ongoing work will assist all Council staff, management, and members in identifying fraud and the risks associated with it. The aim is to ultimately provide the highest level of assurance possible utilising a joined-up service in association with our colleagues involved in Audit, Risk Management, and the Council itself to minimise fraud loss to the lowest level possible.
- 1.3 Audit Committee members requested regular updates on the Council's Counter Fraud activity to improve accountability; this report aims to meet this requirement and that required under the Anti-Fraud, Bribery and Corruption Policy and the accompanying Strategy and Response Plan.

2. Embedding the Anti - Fraud Culture.

- 2.1 The Anti-Fraud Bribery and Corruption Policy and the accompanying Anti-Fraud Bribery and Corruption Strategy and Response Plan are available to view and represent the Councils commitment to fighting fraud and corruption and ensuring that it continues to build resilience in protecting the public purse.
- 2.2 These documents give clear guidance and ensure that all staff and members and the public can report fraud and irregularity suspicions directly to counter fraud specialists retained within the assurance services provided by the Partnership. The team have direct contacts with the Police and other law and enforcement agencies, which in turn ensures that all allegations are taken seriously and dealt with appropriately.
- 2.3 As part of the integrated approach to fighting fraud across the region, the Counter Fraud Services team are looking to rationalise the Policy's and Strategies of all the DAP Partners and clients across the piece. This will allow for a consistent and robust response to fraud across Devon and beyond.
- 2.4 The Policy and the accompanying Strategy and Response plan are due for update later this year.

3. Integration of Counter Fraud, Risk Management, and Internal Audit.

- 3.1 The integration between these assurance arms continues to evolve and strengthen. Regular meetings between the relevant managers and staff ensure that cross collaboration is growing and improving so that auditors are aware of fraud and risk issues (See Appendix 1).
- 3.2 Assurance meetings between Devon Audit Partnership and the Director of Finance and Public Value (Section 151 Officer), along with members of the Finance and Public Value Leadership Team ensure that direction, clarity and flexibility continue to improve.



3.3 The team continues to support our colleagues in Audit and Adults and Children's Social Care teams, specifically looking at the risks linked to Cyber Enabled frauds that may affect some of the most vulnerable members of our society. We are committed to further increasing awareness and supporting the most vulnerable in society who are more at risk of falling victim to fraudsters. DAP is working with its colleagues in the NHS and Audit South West closely to understand and reduce fraud risks within pre-paid accounts funded care plans. More information can be obtained via the Action Fraud website on fraud affecting the most vulnerable.

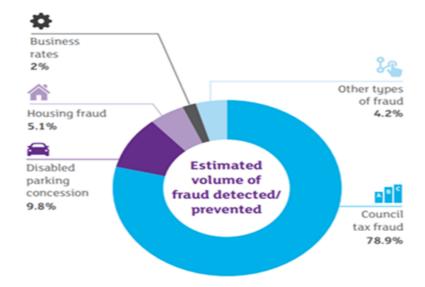
3.4 We are currently networking with all the Devon District / Borough Councils to improve overall fraud resilience in Devon. We are also obtaining a mutual support and knowledge exchange with our counterparts in Cornwall County Council and the Local NHS Trusts. The West of England Fraud Group has now been revived, which involves Councils across the region looking at Fraud, Risk and Audit issues which affect us all. Resilience and overall assurance are improved by the sharing awareness and knowledge, joining with others increases confidence in decision making and the Team will continue to look for new partners and agencies to further this end.

4. National Fraud Initiative

4.1 The <u>National Fraud Initiative</u> (NFI) is an exercise run and reported on by the <u>Cabinet Office</u> that matches electronic data within and between public and private sector bodies to prevent and detect fraud and error.



- 4.2 Devon Audit Partnership acts as the point of contact between the Cabinet Office and the Council in matters relating to the National Fraud Initiative, this being a mandatory Biannual exercise in fraud prevention and detection.
- 4.3 The next cycle of the NFI National Exercises has started. The previous exercise resulted in changes in entitlement which have resulted in an (estimated) total of £1,451,893.86 in potential savings across the Council.



- 4.4 The Counter Fraud Team have successfully submitted data in the following areas of business.
 - Creditors
 - Payroll
 - Pensions (Able to submit their own data)
 - Blue Badge (Supplied by National Blue Badge Scheme)
 - Concessionary Travel Passes
 - Parking Permits
- 4.5A total of 18,204 matches have been returned with 14,278 being considered as key matches, many of these matches will be risk scored to assist in the resolution of the records. Low grade matches may only require sample testing, to give assurance.

At the time of writing this report the following matches have been dealt with.

- Concessionary Travel Passes all matches completed totalling 1487 with 630 passes cancelled. The Cabinet Office saving figure attributed to this area in total is £19,530.00
- Payroll all 18 matches reviewed, 16 closed as already known, 2 under further review.
- Parking Permits all 38 matches reviewed, 28 cleared as already known, 10 under further review.
- VAT potentially overpaid all 361 matches reviewed and all cleared as no issue and accurate.
- Action continues in other areas and will be included in future updates to the Committee and further savings figures are expected.

4.6 Devon Audit Partnership will support and encourage completion of the NFI returns and results will be reported to the Audit Committee in the regular Counter Fraud Updates in future.

5. Investigations and other ongoing work

- 5.1 In the financial year 22/23, the Counter Fraud Services (CFS) Team received a total of 85 referrals, 55 of which related to potential Blue Badge misuse. A further 22 related the loss or theft of IT equipment.
- 5.2 The CFS team currently have 16 live investigations. (Details of individual investigations cannot be disclosed due to the sensitive nature of the information).
- 5.3 The team has highlighted and is heavily involved in assisting DCC with setting up, managing, and completing an exercise which allows participating Councils to identify instances of the incorrect application of Single Person Discounts, (SPD) related to Council Tax across Devon with all Councils who agree to participate. Most Councils will have been involved in this type of exercise in the past, however in this instance we are looking to involve all Districts and Boroughs in the same exercise to maximise Council Tax accuracy and correct billing across the County.
 - All Districts and Boroughs have submitted a point of contact to enable this exercise to progress and all Councils will be approached by the third-party agent with a view to completing this exercise within twelve months.
- 5.4 We continue to support service areas that require data analysis and monitoring of transactions to act as early warning of impending cyber-attacks.
- 5.5 In the coming months the DAP Counter Fraud Team will be looking to support the Traffic Management Team in the enforcement process around Blue Badge misuse. A plan of action will be submitted to maximise publicity and outcomes whilst improving general awareness and access for those with genuine entitlement.
- 5.6 Work towards creation of a Council wide Fraud Risk Register continues and will be reported on in a future update to Audit Committee.
- 5.7 Regular reports and updates from varying sources such as the <u>National Anti-Fraud Network</u> (NAFN) and the <u>National Cyber Security Centre</u> (NCSC) are circulated across the Council by the Counter Fraud Services team to ensure knowledge and awareness are kept at levels suitable for the protection of the public purse and the public themselves.

6. Counter Fraud resilience and Best Practice Checklist

- 6.1 The Chartered Institute of Public Finance and Accountancy (CIPFA) reports that local authorities have achieved success by taking a structured response to fraud and that they now need to respond to an ever-increasing fraud threat, and further develop and enhance their counter fraud response by ensuring that it is comprehensive and effective and focused on the key changes that will make the most difference.
- 6.2A local authority is self-regulating in respect of counter fraud. It should aim to show that it undertakes realistic self-assessment and has identified and understands the major risks it faces. It should acknowledge the problems and put in place plans which can demonstrate that it is taking action with visible outcomes. It should aim to create a transparent process and report the results to the corporate management team and those charged with governance.

6.3 The results in **Table 1** below (page 6) shows the expected response from a local authority, and our assessment of Devon County Councils arrangements against expectations. It is clear that the Council complies in almost all areas of Counter Fraud best practice. However further work in Joining up the 'Fraud Risk Management' process and Counter Fraud and Audit knowledge between DAP and the Council will add further value to the give a more robust integrated assurance.

7. Counter Fraud 2023/24

- 7.1 During 2022/23 we undertook a review of the DCC strategy and approach, for 2023/24 we proposed the following plan.
 - Policy and Strategy Review due in August 2023
 - An increase in the use of data analysis to highlight and resolve potential high risk fraud threat areas. This work has started and will continue.
 - Focused reviews Blue Badge operation, Pensions, (using data analysis), other loss avoidance / revenue maximisation initiatives, such as the current Single Person Discount review exercise across Devon. **Ongoing**
 - Integration with Audit Plan Work Reducing fraud risk in systems (key areas). Ongoing
 - Assurance on corporate risk and support for NFI. Ongoing
 - Investigation of potentially fraudulent activity. Ongoing
 - Awareness Creation of a proactive publicity campaign for Counter Fraud.
 - Training Ensure that training is available and up to date for Staff, Members and beyond.
 Ongoing

8. Other fraud related updates

8.1 On the 27th March 2023 the Government launched a review of the whistleblowing framework and the legislation that supports workers who blow the whistle on wrongdoing in the workplace Government reviews whistleblowing laws.

The review will cover central topics, key to the whistleblowing framework:

- who is covered by whistleblowing protections.
- the availability of information and guidance for whistleblowing purposes (both on gov.uk and that provided by employers).
- how employers and prescribed persons respond to whistleblowing disclosures, including best practice.

The full terms of reference can be found on the gov.uk website.

- 8.2 In May HM Government produced a substantial Policy Paper entitled <u>Fraud Strategy: stopping scams and protecting the public</u>. The aims of the strategy are that it "will tackle fraudsters head on and cut fraud by 10% by 2025, protecting the British people's hard-earned cash from criminals and putting more fraudsters behind bars." By committing to three 'Key Actions' to -
 - Pursue fraudsters
 - Block fraudsters
 - Empower the public

9. Conclusion

- 9.1 Fraud attacks the very foundations of society and that of any fair and equitable system of support for those who need Devon County Councils services the most. All indicators show that as finances become more difficult, individuals make decisions that they would otherwise potentially not make under other circumstances.
- 9.2 Devon County Council's continues to show that it is committed to improving its assurance

- position in respect of its fight against fraud and it has never been more important to minimise losses to fraud in order to protect Council Services and those they serve.
- 9.3 We will continue to assist the Council in building stronger defences and protection against fraud to ensure that every £ of public spending goes on those who legitimately require it, when they need it and that those who would defraud the system are dealt with appropriately and robustly.

Counter Fraud resilience and Best Practice Checklist

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
1. The local authority has made a proper assessment of its fraud and corruption risks, has an action plan to deal with them and regularly reports to its senior Board and its members.	The Authority is working towards a Fraud and Corruption risk register. This will identify the risks and the controls in place to address these risks.
	This will then be considered by the Senior Management Team.
2. The local authority has undertaken a fraud risk assessment against the risks and has also undertaken horizon scanning of future potential fraud and corruption risks. This assessment includes the understanding of the harm that fraud may do in the community	The creation of a fraud risk register assessment is ongoing and risks will now be updated as and when new risks arise.
	In terms of horizon scanning, internal audit (DAP) provide updates on emerging fraud risks and the Devon Audit Group also helps to inform officers of locally developing issues.
	A local network of key contacts also helps to identify trends and developments.
3. There is an annual report to the audit committee, or equivalent detailed assessment.	The Devon Audit Partnerships Counter Fraud Services Manager produces regular updates for Audit Committee.
	An Annual and Half Year Report on counter fraud and corruption activity are produced for Audit Committee.
4. The relevant portfolio holder has been briefed on the fraud risks and mitigation	The Chair of the Audit Committee is briefed on fraud risks, mitigations and other activity directly.
5. The audit committee supports counter fraud work and challenges the level of activity to ensure it is appropriate in terms of fraud risk and resources.	The Audit Committee supports all officers in their work to prevent, detect and investigate fraud and corruption.
	Officers from partner organisations (e.g. Devon Audit Partnership) will be used to provide specialist skills and additional resources as and when required.
6. There is a counter fraud and corruption strategy applying to all aspects of the local authority's business which has been communicated throughout the local authority and acknowledged by those charged with governance.	The Council has an up-to-date Anti-Fraud Bribery and Corruption Policy, an Anti-Fraud, Bribery and Corruption Strategy and Response Plan. Both documents have been made available to all staff and form part of the eLearning training available to staff and Members.
	These documents will be reviewed later this year to ensure they continue to conform with the latest standards and known issues.
7. The local authority has arrangements in place that are designed to promote and ensure probity and propriety in the conduct of its business.	No system or process can ever be 100% secure, and so employee diligence is always needed, and this is referred to in section 4 "prevention" in the current Strategy and Response Plan as above.
	The Policy above also identifies expectations and responsibilities of those conducting
	Council business.

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
	The creation of a specific list of risks for areas with each part of the Councils business remains a work in progress.
9. Counter fraud staff are consulted to fraud-proof new policies, strategies and initiatives across departments.	The Authority has access to the Counter Fraud Services Manager and Accredited Counter Fraud Specialist investigators at DAP.
	New policies and strategies are always considered in the light of possible fraud and corruption and are designed to limit such exposure.
10. Successful cases of proven fraud/corruption are routinely publicised to raise awareness.	The Council has committed to maximising publicity in cases of proven fraud or corruption to ensure that awareness is raised and others are discouraged from potentially attempting to defraud the Council in the future.
11. The local authority has put in place arrangements to prevent and detect fraud and corruption and a mechanism for ensuring that this is effective and is reported to committee.	All systems are designed to prevent fraud occurring. The diligence of management and staff is also key in this.
	A risk assessment is undertaken of the key risks of fraud, and the controls in place to prevent this taking place.
	The annual Internal Audit plan is prepared taking in to account risks, which include fraud risks. Internal audit will provide assessment on the effectiveness of controls, and test controls to ensure that they are being complied with in practice.
	The Audit Committee is provided reports on risk, fraud and the results of Internal Audit, and this, combined with management assessment of controls.
12. The local authority has put in place arrangements for monitoring compliance with standards of conduct across the local authority covering:	
codes of conduct including behaviour for counter fraud, anti- bribery and corruption	The Anti-Fraud Policy, Strategy and Response Plan clearly set out duties and responsibilities in connection with Fraud, Bribery and Corruption.
- register of interests	Staff The Council has Guidance on the declaration of business or pecuniary interests' page. Which clearly states "Section 117 of the Local Government Act 1972 states that: "If it comes to the knowledge of an officer employed by a local authority that a contract in which he has any pecuniary interest, whether direct or indirect, has been, or is proposed to be entered into by the authority or any committee thereof, he shall as soon as practical give notice in writing to the authority of the fact that he is interested therein". Elected Members declaration of interests are
	held on their individual records within the Councils systems and can be accessed via Your Councillors.

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
- register of gifts and hospitality.	Elected Members register of gifts and hospitality are held on their individual records within the Councils systems and can be accessed via Your Councillors
13. The local authority undertakes recruitment vetting of staff prior to employment by risk assessing posts and undertaking the checks recommended in FFCL 2020 to prevent potentially dishonest employees from being appointed.	The Council undertakes 'recruitment' and 'employment screening' which cover the employee vetting. All offers of employment are subject to satisfactory pre-employment checks.
	Mandatory checks include: -
	References
	Verification of employment history Verification of professional qualifications and memberships
	Verification of ID, nationality and immigration status and right to work in the UK
	Medical clearance
	Some posts require additional checks including
	• DBS
	Credit checks
	Checks on company directorships held, resigned, or disqualified from (not routinely undertaken)
14. Members and staff are aware of the need to make appropriate disclosures of gifts, hospitality, and business. This is checked by	At the start of each Council meeting a declaration of interests is requested.
auditors and reported to committee.	The Governance lead will remind all officers and members of the need to declare all offers of gifts and hospitality.
15. There is a programme of work to ensure a strong counter fraud culture across all departments and delivery agents led by counter fraud experts.	This is constantly being addressed and the Council is engaged with Counter Fraud professionals to improve knowledge understanding and culture across the organisation.
16. There is an independent whistle-blowing policy which is monitored for take-up and can show that suspicions have been acted upon without internal pressure.	A separate Whistleblowing Policy is in place. This Policy will be reviewed as and when required and will be taken through the Audit Committee.
17. Contractors and third parties sign up to the whistle-blowing policy and there is evidence of this. There should be no discrimination against whistle-blowers.	At present the whistleblowing policy applies to all Council workers, including elected and co-opted Members, employees, staff of Council contractors, suppliers of goods and services and agency staff.
18. Fraud resources are assessed proportionately to the risk the local authority faces and are adequately resourced.	The DAP Counter Fraud Services Team have fully trained and qualified fraud investigators. The Authority will look to "call off" resources as and when the need arises.

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
19. There is an annual fraud plan which is agreed by committee and reflects resources mapped to risks and arrangements for reporting outcomes. This plan covers all areas of the local authority's business and includes activities undertaken by contractors and third parties or voluntary sector activities.	There is no annual fraud plan as such. However, there are a range of "work programmes" that are prepared each year, including actions arising for the Governance Review process, Risk Management and Internal Audit.
	The elements of each of these various plans enables senior management to be assured that suitable resources are being allocated to prevent, detect and investigate fraud.
20. Statistics are kept and reported by the fraud team which cover all areas of activity and outcomes.	The Counter Fraud Services Team within DAP record and report on all allegations of fraud against the Council. All evidence is held and disposed of in accordance with the relevant legislation.
21. Fraud officers have unfettered access to premises and documents for the purposes of counter fraud investigation.	DAP is a partnership that supplies and supports the Internal Audit, Fraud and Risk functions of the Council. Where access is required to investigate fraud, lawful access would be granted. For example, if DAP were asked to investigate using their Counter Fraud Team, then "full access" would be granted as per the service level agreement already in place and in accordance with Schedule 2 Part 1 2(1) of the Data Protection Act 2018
22. There is a programme to publicise fraud and corruption cases internally and externally which is positive and endorsed by the council's communication team.	Not a programme as such, but the Council is committed to proven cases of fraud being publicised in the local newspaper and via internal channels. 23/24 sees a commitment to improved Comms around this subject.
23. All allegations of fraud and corruption are risk assessed.	Each referral or suspicion will be "risk assessed" before embarking upon a course of action proportionate to the issue and in line with the Councils Anti-Fraud, Bribery and Corruption Policy.
24. The fraud and corruption response plan covers all areas of counter fraud work: • Prevention • Detection • Investigation	The Councils Anti-Fraud, Bribery and Corruption Policy along with the Strategy and Response Plan cover all of these areas.
SanctionsRedress	
25. The fraud response plan is linked to the audit plan and is communicated to senior management and members.	The Counter Fraud Manager and the Audit Manager at DAP ensure that the plans are linked and communicated to senior management and members.
26. Asset recovery and civil recovery is considered in all cases.	The Anti-Fraud, Bribery and Corruption Policy along with the Strategy and Response Plan commit the Council to this course of action.
27. There is a zero-tolerance approach to fraud and corruption which is always reported to committee.	There is a "zero tolerance approach to fraud, endorsed by the Audit Committee. (See

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
	Sections 1 and 2 of the Anti-Fraud, Bribery and Corruption Policy)
	Instances of fraud and corruption are reported to the Audit Committee. Due to the sensitive nature of some instances, this may be in summary form.
28. There is a programme of proactive counter fraud work which covers risks identified in assessment.	Proactive counter fraud work is delivered in a variety of ways each year. Some examples of how this is achieved include:-
	Participation in the bi-annual National Fraud Initiative (NFI)
	Elements of internal audit work focused on controls that may be more susceptible to fraud risk
	Work by Districts and Boroughs – such as Council Tax Single Persons Discount review.
29. The fraud team works jointly with other enforcement agencies and encourages a corporate approach and co-location of enforcement activity.	Early referral to the Police or other agencies such as the Department for Work and Pensions will be considered as part of the risk assessment for each referral.
	Joint working is always considered in order to facilitate learning and cost efficiency.
30. The local authority shares data across its own departments and between other enforcement agencies.	The main external data sharing is via the National Fraud Initiative (NFI). Where appropriate lawful sharing of data will be permitted in accordance with Schedule 2 Part 1 2(1) of the Data Protection Act 2018.
	Internal data analysis is also undertaken to prevent and detect fraud. This is an area of that DAP is looking to explore and expand further in the coming months.
	The Council has also supported and continues to support initiatives at District / Borough level.
31. Prevention measures and projects are undertaken using data analytics where possible.	Such examples include making good use of
	 The National Fraud Initiative Council Tax - Single persons discount review
	Departmental support for fraud prevention, detection and audit support are regularly undertaken.
32. The local authority actively takes part in the National Fraud Initiative (NFI) and promptly takes action arising from it.	Data is submitted every two years, with "matches" then investigated in accordance with the scoring of the match (e.g. higher scored matches reviewed first, lowest reviewed last and in accordance with resources available).
33. There are professionally trained and accredited staff for counter fraud work. If auditors undertake counter fraud work they too must be trained in this area.	The Council has access to, and will make use of, Counter Fraud Specialists at Devon Audit Partnership as and when the need arises.
	All Counter Fraud Team staff are Accredited Counter Fraud Specialists by the Counter Fraud Professional Accreditation Board (CFPAB)

CIPFA / CIFAS expected Local Authority / Public Body response to the risk of fraud and corruption.	DCC Response
34. The counter fraud team has adequate knowledge in all areas of the local authority or is trained in these areas.	The Counter Fraud Team at DAP are fully trained and accredited Counter Fraud Specialists and have dealt with and prosecuted hundreds of cases for Councils in the region involving many areas of Council business.
35. The counter fraud team has access (through partnership/other local authorities/or funds to buy in) to specialist staff for: Surveillance Computer forensics Asset recovery	The Council, the Counter Fraud Team and wider Devon Audit Partnership Team and affiliates have access to specialist staff that can fully and professionally fulfil the legal requirements under all of the points.
Financial investigations.	
36. Weaknesses revealed by instances of proven fraud and corruption are scrutinised carefully and fed back to departments to fraud proof systems.	The Authority is committed to ongoing and continual improvement. Any weaknesses identified will be addressed wherever possible, although it should be noted that no system can ever be considered 100% free from the risk of fraud.
37. Counter Fraud Training is available for all staff and members to ensure that they are up to date with relevant threats and are able to identify and report fraud appropriately. Fraud awareness is specifically important for those involved in the Procurement process as highlighted in Review into the risks of fraud and corruption in local government procurement	The Council has an eLearning package that is available to all staff and Members. All new starters are required to complete this learning. Specific counter fraud risk area training has and will be obtained through the Counter Fraud Services Team as required. Specific training has previously been given to Procurement and Finance areas of the Councils business.
38. The Local Government Transparency Code Identifies what information must be published annually (para 53) and what is suggested (para 68)	It does not appear that this information is currently published. Recommend that this is resolved and the DAP Counter Fraud Services Manager can assist with clarification where required.

Ken Johnson Counter Fraud Services Manager

Tony Rose Head of Devon Audit Partnership

Devon Audit Partnership has been formed under a joint committee arrangement comprising of Plymouth, Torbay, Devon, Mid Devon, North Devon, Torridge, South Hams and West Devon councils. We aim to be recognised as a high-quality assurance service provider in the public sector.

We work with our partners by providing a professional internal audit service that will assist them in meeting their challenges, managing their risks and achieving their goals. In carrying out our work we are required to comply with the Public Sector Internal Audit Standards along with other best practice and professional standards.

The Partnership is committed to providing high quality, professional customer services to all; if you have any comments or suggestions on our service, processes or standards, the Head of Partnership would be pleased to receive them at tony.d.rose@devon.gov.uk.

Confidentiality and Disclosure Clause - This report is protectively marked in accordance with the Government Security Classifications. It is accepted that issues raised may well need to be discussed with other officers within the Council, the report itself should only be copied/circulated/disclosed to anyone outside of the organisation in line with the organisation's disclosure policies.

This report is prepared for the organisation's use. We can take no responsibility to any third party for any reliance they might place upon it.

(Fighting Fraud and Corruption Locally 2020)



Appendix I - Audit, Risk & Counter Fraud Integration Plan Support, Assurance and Innovation



Our Vision

To be a leading provider of internal audit, counter fraud, risk management and other assurance services to public and not-for-profit organisations in the South West and beyond.



Our Goals

Operational delivery

- CFT to co-ordinate / undertake irregularities work coming through the audit plan
- Potential irregularities are triaged to fraud or audit for review
- Proactive fraud work e.g. NFI, developing delivery plan at client level
- Investigation work to be completed jointly (where appropriate) to progress possible fraud review and strengthen internal control frameworks
- Audit scoping to include counter fraud input
- Three-way liaison confirming risk and control
- Integrated reporting to be delivered on a case basis



Client Services

Counter Fraud Strategy with each client

Regular client liaison Mtgs.

POC access to additional integrated services

CF Service plan with each client for both pro-active and re-active services

Joint Partner CF work e.g. SPD

Client training on Fraud Awareness

IA, Risk & CF Working Together

Joint Working Practices

Joint scoping of audit and Irregs

CF Risk Assessment Review - CIFAS

Joint IA, Risk & CF plan Pro-active **Prevention** work Pro-active **Detection** work Effective **Investigation**

NFI work co-ordinated by CFT

Efficiency

Savings Plan £55k by year three

Restructure of PCC Team work plan (releasing resources)

Joint working practices

Single Point of Contact for Fraud and Irregs

Infrasturcture

Budget - Costcentre focused

Laptops for CFT

ICT Platform & common network access

Data Sharing Agreements updated

Terms and Conditions review

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