

APPENDIX 3: ANTI FRAUD & CORRUPTION GOVERNANCE FRAMEWORK (FIGHTING FRAUD LOCALLY)

GOOD PRACTICE ELEMENTS	SELF ASSESSMENT	ACTIONS REQUIRED	ACTION DATE	LEAD
UNDERSTANDING THE RISKS				
<p>The Council has made a proper assessment of its fraud and corruption risks and:</p> <ul style="list-style-type: none"> • has an action plan to deal with them • regularly reports on this to its senior board and members (FFL1). 	<p>The high fraud risk areas for local government are identified in all the national publications.</p> <p>The Corporate Counter Fraud Plan approved by the Audit Committee in June 2013 covers all these areas.</p> <p>An immediate issue is to ensure all new activities or operating arrangements are identified and assessed for fraud risks.</p> <p>Progress in delivering this work is reported periodically to Corporate Management Team (CMT) and the Audit Committee (AC).</p>	<p>Review the current arrangements to ensure they are still effective in enabling the Head of Internal Audit to identify developing Council risks in a timely manner.</p>	March 2014	Head of Internal Audit
		<p>Identify a fraud risk assessment methodology that can be applied across the Council.</p>	March 2015	Fraud Manager
<p>The Council has undertaken horizon scanning of future potential fraud risks (FFL3).</p>	<p>There is currently no systematic process in place for doing this.</p> <p>Once new activities or changes to current activities are identified, the potential risks will be considered.</p>	<p>See above re timely identification of risks.</p>		
		<p>Assess whether horizon scanning for fraud risks needs to be more explicitly built into the Council's risk management framework.</p>	March 2015	Policy and Governance Manager
<p>The risk of fraud and corruption is specifically considered in the Council's overall risk management process (FFL6).</p>	<p>The risk management framework requires that fraud is a risk that should be considered at every level where a risk register is produced.</p>	<p>Review and if necessary update the corporate risk management arrangements to make explicit the need to assess fraud potential risks.</p>	March 2015	Policy and Governance Manager

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There are risk assessment methodologies in place to identify activities that are potentially high risk concerning:	High risk services <ul style="list-style-type: none"> • were assessed in 2011 • received training in 2012. 	Confirm the continued relevance of these risk assessments as part of the 2014/15 corporate counter fraud planning exercise.	March 2014	Fraud Manager
<ul style="list-style-type: none"> • money laundering 	Yes	Determine whether any additional action or refresher training is required to meet the statutory requirements.		
<ul style="list-style-type: none"> • bribery. 	Yes			
POLICIES AND STRATEGIES				
There is a zero tolerance approach to fraud and corruption that is reported to Committee (FFL25).	A zero tolerance approach is declared in the Anti Fraud and Corruption Policy which has been updated and approved by: <ul style="list-style-type: none"> • CMT and the AC in March 2013 • Cabinet in June 2013. 	None		
There is a counter fraud and corruption strategy applying to all aspects of the Council's business which has been:	The policy was subject to a fundamental review and then approved by CMT and AC in June 2011. It was updated in March 2013 to include references to all school staff and governors.	None		
<ul style="list-style-type: none"> • communicated throughout the Council 	The policy was distributed with a briefing note in Oct 2011 for discussion at team meetings. Acknowledgements were received from all Group Managers that this had been done. The requirement for schools to adopt this has been included in the 'Scheme for Financing Schools'. It is available on the internet and Southend Learning Network.	Produce a briefing note for Headteachers outlining what is required of them to roll this policy out in their school. Provide a pack of basic information for schools to use, e.g. induction sheets, posters / leaflets.	March 2014	Fraud Manager

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	A briefing note was sent to all Members in Feb 2012.	None		
	A briefing note is included in both member and officer induction packs. This was last reviewed January 2013.	Ensure information contained in the member induction pack is up to date.	May 2014	Fraud Manager
	Standard fraud posters and leaflets are available throughout the Council and the Borough. Last redesigned Autumn 2012. If the longer term working relationship with Thurrock is confirmed, posters and leaflets will be updated with a common reporting line for all those using the service.	None at present		
	There is a standard on-line awareness raising training module.	Check the on-line training module is still fit for purpose. Make the on-line training module available to members, schools, South Essex Homes and other local councils.	March 2015	Fraud Manager
<ul style="list-style-type: none"> • acknowledged by those charged with governance (FFL4). 	Each time the policy is updated it is taken to CMT, AC and, where necessary, Cabinet to approve.	None		

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<p>There is an independent Whistleblowing policy which:</p>	<p>The policy was subject to a fundamental review and then approved by CMT and AC in June 2011.</p> <p>A schools version of the Council's policy was produced in March 2013.</p> <p>The requirement for schools to adopt this is included in the 'Scheme for Financing Schools'.</p> <p>It is available on the internet and Southend Learning Network.</p>	<p>See above about communicating the Anti Fraud and Corruption Policy and Strategy.</p>		
<ul style="list-style-type: none"> has been measured against the British Standards Institute 	<p>Yes and it complies with good practice guidance.</p>	<p>Amend the Whistleblowing Policy to take account of the reforms contained in the Enterprise and Regulatory Act 2013.</p>	<p>March 2014</p>	<p>HR Team Leader, Strategy & Policy</p>
<ul style="list-style-type: none"> is monitored for take up 	<p>The Counter Fraud Team maintains a register on behalf of the Head of Legal & Democratic Services.</p>	<p>None</p>		
<ul style="list-style-type: none"> it can be shown that suspicions have been acted upon without internal pressure (FFL14). 	<p>There have been no centrally reported disclosures in the last few years.</p>	<p>Refer awareness raising campaigns.</p>		
<p>There is no evidence of discrimination for those who whistleblow (FFL15).</p>				

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Contractors and third parties sign up to the Whistleblowing Policy and there is evidence of this (FFL16).	<p>There is a standard paragraph included in all contract documentation that goes through the Corporate Procurement Team.</p> <p>This was last reviewed January 2013.</p>	None		
	<p>It is unclear whether this is the case for contracts or other types of agreements arranged by services.</p>	<p>Ascertain how to ensure services build the same paragraphs into service let contracts or agreements.</p>	March 2015	Fraud Manager
<p>The Council also maintains a policy and strategy covering money laundering.</p>	<p>The policy was subject to a fundamental review and then approved by CMT and AC in June 2011.</p> <p>It has been updated in March 2013 to include references to all school staff and governors.</p> <p>The requirement for schools to adopt this is included in the 'Scheme for Financing Schools'.</p> <p>It is available on the internet and Southend Learning Network.</p>	None		
<p>Relevant staff are made aware of this policy and are trained in its application.</p>	<p>Based on the results of the risk assessment, the relevant teams had refresher training in 2012.</p>	<p>Update the risk assessment and reassess the need for training.</p>	March 2014	Fraud Manager
		<p>Deliver refresher training as required.</p>	March 2015	Fraud Manager

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<p>The Council maintains a prosecution policy detailing all possible sanctions including asset recovery and civil recovery which is:</p> <ul style="list-style-type: none"> • considered in all cases • linked to a written sanctions policy (FFL24). 	<p>The policy was subject to a fundamental review and then approved by CMT and AC in June 2011.</p> <p>It has been updated in March 2013 to include references to all school staff and governors.</p> <p>The requirement for schools to adopt this is included in the 'Scheme for Financing Schools'.</p> <p>It is available on the internet and Southend Learning Network.</p>	<p>Review and update as necessary to reflect the new working practices of the Counter Fraud Team.</p>	<p>March 2015</p>	<p>Fraud Manager</p>
<p>The Counter Fraud Team is consulted to fraud proof new policies, strategies and initiatives across departments.</p> <p>This is reported upon to committee (FFL7).</p>	<p>This does not happen currently.</p>	<p>Review the current arrangements to ensure they are still effective in enabling the Head of Internal Audit to identify developing Council risks in a timely manner.</p>	<p>March 2014</p>	<p>Head of Internal Audit</p>
<p>There are up to date codes of conduct for both staff and members.</p>	<p>The Members Code of Conduct was updated in September 2012 in line with new government guidance.</p>	<p>None</p>		
	<p>The staff Code of Conduct is being updated. The work is substantially complete. It then needs to go through the normal approval process.</p>	<p>Complete the update of the staff Code of Conduct.</p>	<p>March 2014</p>	<p>HR Team Leader, Strategy & Policy / Group Manager, People & OD Team</p>
<p>Develop a programme of activities to raise staff awareness of the requirements of the Code of Conduct.</p>	<p>March 2015</p>			

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<p>Members and staff are aware of the need to make appropriate disclosures of gifts, hospitality and declarations of interest.</p> <p>This is checked by auditors and reported to committee. (FFL11).</p>	<p>Code of Conduct requires members to complete the relevant forms for declaring interests as well as gifts or hospitality annually and these are centrally held. The form was last reviewed Jan 2013.</p> <p>External Audit review and report on this as part of the financial accounts audit.</p>	None		
	<p>Code of Conduct requires staff to declare interests as well as gifts or hospitality.</p> <p>A proposal to update these arrangements has been approved in principle by Corporate Management Team.</p>	<p>Set out how the declarations of interest, hospitality and gifts arrangement will operate for staff.</p>	<p>January 2014</p>	<p>Fraud Manger</p>
		<p>Undertake relevant consultations on the proposals.</p>	<p>February 2014</p>	<p>Fraud Manger</p>
		<p>Develop electronic registers for staff to complete in both areas.</p>	<p>March 2014</p>	<p>Fraud Manger</p>
<p>The Constitution, Financial Procedure Rules and other relevant documents are consistent with these policies.</p>	<p>These need review in relation to the current policies in this area.</p>	<p>Amend where required and present to CMT for consideration.</p>	<p>March 2014</p>	<p>Head of Internal Audit</p>
<p>The Council has arrangements in place that are designed to promote and ensure probity and propriety in the conduct of its business (FFL5).</p>	<p>The framework is set out in the Local Code of Governance and the Codes of Conduct for Members and Staff.</p> <p>The Local Code of Governance was last considered by the AC in Sept 2013 and approved by Cabinet on 5 November 2013.</p>	<p>See above re Codes of Conduct.</p>		

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POLICY IMPLEMENTATION				
The Council has put in place:				
<ul style="list-style-type: none"> arrangements to prevent and detect fraud and corruption 	Refer to this action plan and the Corporate Counter Fraud Plan.	None.		
<ul style="list-style-type: none"> a mechanism for ensuring this is effective and reporting this to Committee (FFL8). 	Refer to this action plan and the Corporate Counter Fraud Plan. Counter fraud activity is reported to CMT and the AC periodically.	None.		
There is a dedicated Anti Fraud and Corruption online reporting mechanism for the Council.	The Council's internet site provides an online reporting mechanism for all types of fraud. The content of the web page was last reviewed January 2013.	None.		
Arrangements have been put into place for monitoring compliance with standards of conduct across the Council including:	Mapping the sources of assurance for this will be picked up as part of the exercise to respond to the updated guidance on Delivering Good Governance.	None.		
<ul style="list-style-type: none"> codes of conduct including behaviour for counter fraud, anti bribery and corruption 				
<ul style="list-style-type: none"> register of interests 				
<ul style="list-style-type: none"> register of gifts and hospitality (FFL9). 				

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<p>The Council undertakes:</p> <ul style="list-style-type: none"> • recruitment vetting of staff prior to employment by risk assessing posts • checks to prevent potentially dishonest employees from being appointed (FFL10). 	<p>The recruitment function is contracted out and includes the responsibility for undertaking pre employment screening.</p> <p>The Corporate Counter Fraud Plan includes an exercise which involves:</p> <ul style="list-style-type: none"> • comparing good practice guidance with the requirements in the current contract to ensure they are fit for purpose • checking a sample of new starter files to see whether the vetting checks required by the current contract are being undertaken. 	<p>Allocate resources from the Counter Fraud Team to undertake this work.</p>	<p>Dec 2014</p>	<p>Fraud Manager</p>
<p>Statistics are kept and reported by the Counter Fraud Team which cover all areas of activity and outcomes, benchmarking where appropriate (FFL18).</p>	<p>The Counter Fraud Team records statistics on all investigations and this information is included in the periodic progress reports to CMT and AC.</p>	<p>Ensure reporting requirements contained in the following documents are consistent and in line with good practice guidance:</p> <ul style="list-style-type: none"> • Anti Fraud and Corruption Policy • Audit Committee Work Programme. 	<p>March 2014</p>	<p>Head of Finance & Resources</p>
	<p>Opportunities to benchmark Counter Fraud Team activity will be explored in due course.</p>	<p>None at present</p>		

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THE COUNTER FRAUD TEAM WORK PROGRAMME				
Fraud resources are assessed and adequately resourced (FFL16).	<p>A limited resource assessment was undertaken when considering how the savings target for the Counter Fraud Team was to be met for 2014/15.</p> <p>Some consideration needs to be given to the potential impact on the service of the government's intention to create a new national fraud unit, should that come to fruition.</p>	An initial review of the fraud resources required to provide a service across the two councils will be undertaken in putting the proposal together.	March 2014	Fraud Manager
There is an annual fraud plan which is agreed by Committee and reflects resources mapped to risks and arrangements for reporting outcomes (FFL17)	<p>A Corporate Counter Fraud Plan was approved by CMT and the AC in June 2013.</p> <p>This will be reviewed and updated annually in March.</p>	None		
This plan covers:				
<ul style="list-style-type: none"> • all areas of the Council's business 	<p>All the high risk fraud activities identified in national publications are contained in the plan.</p>			
<ul style="list-style-type: none"> • activities undertaken by contractors and third parties 	<p>Contract and procurement fraud risks are also included in the plan.</p>	<p>Assess the potential fraud risk from other third parties and the voluntary sector.</p>	March 2014	Fraud Manager
<ul style="list-style-type: none"> • voluntary sector (FFL17). 	<p>This is not currently included in the plan.</p>	<p>Determine whether these fraud risks are significant enough to be included in the Corporate Counter Fraud Plan for 2014/15.</p>		

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There is a programme of work to ensure a strong counter fraud culture across all departments and delivery agents led by counter fraud experts (FFL12).	Refer Corporate Counter Fraud Plan	None		
There is a programme of proactive counter fraud work which covers risks identified in the assessment (FFL26).	Refer Corporate Counter Fraud Plan	None		
The written fraud response plan covers all areas of counter fraud work: prevention, detection, deterrence, investigation, sanction and redress (FFL22).	The Anti Fraud and Corruption Policy and Strategy (June 2013) explicitly states this is the approach adopted to tackle fraud. This is also contained in the Corporate Counter Fraud Plan.	None		
The fraud response plan is:				
<ul style="list-style-type: none"> • linked to the Audit Plan 	There is not a clear link at the moment between the Internal Audit Plan and the Corporate Counter Fraud Plan.	Ensure there is a clear link between Internal Audit Plan and the Corporate Counter Fraud Plan for 2014/15, taking into account the requirements of: <ul style="list-style-type: none"> • Fighting Fraud Locally • UK Public Sector Internal Audit Standards. 	March 2014	Head of Internal Audit & Fraud Manager

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<ul style="list-style-type: none"> communicated to senior management and members (FFL23). 	<p>Corporate Counter Fraud Plan was approved by CMT and the AC in June 2013.</p>	None		
<p>There are professionally trained staff for counter fraud work trained by professionally accredited trainers using the Counter Fraud Professional Accreditation Board (FFL31).</p>	<p>All counter fraud staff hold the relevant PINS qualification.</p> <p>In order to operate more effectively and proactively against criminals, it is necessary to provide the team with some additional skills. These additional skills will return additional powers to recoup losses, as well as additional revenue for non-council 'crimes' proven by the same investigations.</p>	<p>Organise:</p> <ul style="list-style-type: none"> premises search and seizure training Accredited Financial Investigator training for all staff involved in investigations Advanced Field Intelligence Officer training. 	<p>March 2014</p>	<p>Fraud Manager</p>
<p>The Counter Fraud Team has adequate knowledge in all areas of the Council or is trained in these areas (FFL32).</p>	<p>The Counter Fraud Team is experienced in investigating benefit fraud and has recently started to undertake non benefit related investigations.</p> <p>The Fraud Manager from Thurrock is experienced in investigating fraud in all areas of the Council's activities. This experience will be passed on in on the job training.</p>	None		

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<p>Counter Fraud Officers have unfettered access to premises and documents for the purposes of counter fraud investigation (FFL19).</p>	<p>The Counter Fraud Team has statutory powers that apply to housing benefit, council tax and housing tenancy fraud.</p> <p>Statutory Powers for corporate investigation are set out in the Local Government Act 1972 – Section 151, 222 and 111.</p> <p>The Head of Internal Audit also has rights of access to property, people, information and records for audit purposes.</p>	<p>Set out the Counter Fraud Team's powers to enable them to undertake investigations in:</p> <ul style="list-style-type: none"> • Corporate Counter Fraud Plan • Financial Procedural Rules. 	<p>March 2014</p>	<p>Head of Internal Audit & Fraud Manager</p>
<p>All allegations of fraud and corruption are risk assessed (FFL21).</p>	<p>Allegations received from HR have been risk assessed prior to referring to the Counter Fraud Team.</p> <p>The team does not currently operate a formal risk assessment methodology.</p> <p>Allegations received from other sources are assessed based on the information provided in the allegation. Internal background checks are carried out, where appropriate, to determine whether a full investigation should be considered.</p>	<p>Implement a more formal risk assessment methodology.</p>	<p>March 2014</p>	<p>Fraud Manager</p>

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Weaknesses revealed by instances of proven fraud and corruption are looked at and fed back to departments to fraud proof systems (FFL34).	<p>The Counter Fraud Team make recommendations at the end of an investigation, if necessary.</p> <p>Further work is required to ensure that:</p> <ul style="list-style-type: none"> • where necessary the Counter Fraud and Internal Audit Teams work effectively together to do this • the Counter Fraud Team is able to properly identify system weaknesses and the controls required to address them. <p>Action plans, once agreed with services, will be followed up as part of the normal quarterly reporting process.</p>	Build time into the Internal Audit Plan to work with the Counter Fraud Team to improve the control framework in areas where frauds are identified.	March 2014	Senior Audit & Resources Manager
		Develop the Counter Fraud Team's understanding of risk, control and assurance through training and on the job support.	March 2015	Senior Audit & Resources Manager & Fraud Manager
There is a programme to publicise fraud cases internally and externally which is positive and endorsed by the Council's Communication Team (FFL13 & 20).	<p>Standard practice is for successful prosecutions to be:</p> <ul style="list-style-type: none"> • sent to the local 'Evening Echo' • included in 'Seaviews' the weekly publications sent to all members and staff. 	None		
WORKING CO-OPERATIVELY				
The Counter Fraud Team:				
<ul style="list-style-type: none"> • works jointly with other enforcement agencies 	The department has formal and informal national frameworks with law enforcement agencies and leads and assist with investigations with agencies such as HMRC, the Department for Work and Pensions, Police and other Local Authorities.	None		

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<ul style="list-style-type: none"> encourages a corporate approach and co-location of enforcement activity (FFL27). 	<p>Internal Audit, the Counter Fraud Team, the Employee Relations Team, Legal Services and Accountancy do work closely together when needed and are continuing to develop these working arrangements.</p> <p>Consideration will be given to developing links with other enforcement activities in the Council as appropriate.</p>	None immediately		
The Council shares data:				
<ul style="list-style-type: none"> across its own departments 	<p>A project is in progress to develop data matches with regards to financial systems. A key outcome from this exercise is that staff will end up with the skills to continue to develop this work in the future with minimal external support.</p>	<p>Ensure the data matching project and the skills transfer is completed.</p>	<p>March 2014</p>	<p>Head of Internal Audit</p>
<ul style="list-style-type: none"> between other enforcement agencies (FFL28). 	<p>Data is shared with the Audit Commission for its National Fraud initiative and the Housing Benefit Matching service. The department is now part of a joint criminal intelligence capability with Thurrock as a Home Office accredited intelligence service working to national guidelines and best practice.</p>	None		
<p>Prevention measures and projects are undertaken using data analytics where possible (FFL29).</p>	<p>As above, the cross-borough intelligence function, which has the capability apply data analytics to investigations, is now in place.</p>	None.		
<p>The Council actively takes part in the NFI and promptly takes action (FFL30).</p>	<p>With regard to the 2012 exercise, data matches are being investigated by services and the results of this work is reported periodically to CMT and the AC.</p>	None		

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<p>There are appropriate fair processing notices on all application forms for services permitting data sharing for the prevention and detection of fraud.</p>	<p>An updated fair processing notice was sent to all Group Managers in January 2013, however a follow up exercise needs to be undertaken to ensure the records are complete.</p>	<p>Obtain a response from all Group Managers setting out where fair processing notices are displayed and when they were displayed from.</p>	<p>March 2014</p>	<p>Fraud Manager</p>
		<p>Set up a database on the intranet of all data sources where a notice is displayed and when from.</p>	<p>Sept 2014</p>	<p>Fraud Manager</p>
<p>The Counter Fraud Team has access (via partnership / other Local Authorities / or funds to buy in) where appropriate to specialist staff for:</p> <ul style="list-style-type: none"> • surveillance • computer forensics • asset recovery • financial investigations (FFL33). 	<p>The fraud service at Thurrock Council has the skills / capabilities to provide all these specialist services.</p> <p>Now that the Council has a joint working agreement with Thurrock Council, it too can access these services and enable the Counter Fraud Team to provide a more comprehensive and effective service.</p>	<p>None at present</p>		

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<p>The Council has undertaken an assessment against the risks contained in:</p> <ul style="list-style-type: none"> • Protecting the Public Purse (FFL2) • CIPFA, Managing the Risk of Fraud • ALARM, Managing the Risk of Fraud. 	<p>An assessment has been completed of the Council's compliance with the criteria contained within the Audit Commission's Protecting the Public Purse 2013.</p> <p>The last review against the other two documents was January 2013.</p> <p>Improvement opportunities identified from each review will be built into the annual Corporate Counter Fraud Plan as required.</p>	<p>Not at present</p>		
<p>There is an annual report to the Audit Committee or equivalent detailing an assessment against the Local Government Strategy Fighting Fraud Locally and this checklist (FFLI4).</p>	<p>The annual report for 2012/13 was presented to CMT and the AC in March 2013.</p> <p>An assessment of performance against this framework and the delivery of the Corporate Counter Fraud Plan will be reported annually to CMT and the AC in either March or June.</p>	<p>None</p>		

Source: Fighting Fraud Locally (FFL), The Local Government Fraud Strategy