

**Appendix 2: Counter Fraud & Investigation Directorate
Southend-on Sea Borough Council Work Programme 2014/15**

Work Stream	Priority	Activities	Current Status 12 December 2014
Overall Arrangements (Fighting Fraud Locally)			
Policies	High	Refresh the Anti Fraud & Corruption Policy taking into account the new working arrangements and national guidance.	Group Counter Fraud & Investigations Manager. March 2015
		Refresh the Money Laundering Policy taking into account the new guidance.	
		Check for consistency, any references to these policies within Contract Procedure Rules, Financial Regulations or other elements of the Constitution.	
		Produce a communication strategy regarding all policies for staff, members and schools and implement it.	Group Counter Fraud & Investigations Manager. 2015/16
Awareness Raising Material	High	Update the posters and leaflets to reflect the new operating arrangements and distribute as required.	Group Counter Fraud & Investigations Manager. March 2015
Bribery Act & Money Laundering	High	Evaluate the new CIPFA Money Laundering Guidance when published in February 2015.	Group Counter Fraud & Investigations Manager. March 2015
		Update the risk assessment survey if necessary.	

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		Distribute to Group Managers, collate the results and identify current, potential risk areas.	Group Counter Fraud & Investigations Manager. May 2015
		Deliver targeted training to those services who have a high exposure to those risks.	Group Counter Fraud & Investigations Manager. September 2015
Southend: Internal Operating Arrangements	High	<p>Evaluate the effectiveness of the CF&I teams operating arrangements with:</p> <ul style="list-style-type: none"> • Legal Services • Revenues • Benefits • Trading Standards. 	<p>The Service Level Agreement with Thurrock Council was signed on 1 October 2014, for a period of three years.</p> <p>This work will be undertaken over the next six months.</p>
		Align the working policies for a shared Prosecution Manual that takes into consideration the improved ability to take criminal redress under the Proceeds of Crime Act that will also be accessed by Trading Standards, Revenues & Benefits services.	
Planned Proactive and Fraud Awareness Exercises			
Procurement / Contracts Letting and Management	High	Undertake further enquires where there are indications that purchases / contracts let have not fully complied with the Council's Contract Procedure Rules.	<p>Internal Audit has completed the work in relation to requesting the tendering and contract documentation for 10, randomly selected contracts over £50k in value - see Quarterly Performance Report.</p> <p>The potential implications for developing proactive fraud work in this area will now be considered.</p>

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Housing Tenancy	High	Undertake a data matching exercise with data aggregator provider.	A broader programme of work has been devised for completion by 31 March 2015, focusing on social housing tenancy fraud, in conjunction with other relevant organisations including South Essex Homes - see performance report.
Housing Benefit	Medium	Explore possibilities to develop in house data matching routines.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise below.
		Undertake targeted exercises if themes arise via investigations being undertaken.	The team are currently undertaking a proactive exercise with the Department of Works & Pensions using 'Real Time Information' from HM Revenues and Customs.
Payroll	Medium	Confirm that appropriate pre-employment checks have been completed.	30 files, selected at random, covering permanent and agency staff were reviewed in March 2014 (Summary Audit Progress Report - June 2014). No significant issues were identified.
			The team has worked closely with HR Business Partner to ensure the Council's requirements in this area are clearly defined in the new recruitment services contract. Compliance with this will be assessed during 2015/16.
		Check national insurance numbers for relevant new appointments to confirm they have the right to work in the UK.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise below.
Blue Badge	Medium	Undertake data matching to identify blue badge holders who have died but their badges have not been returned.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise below.

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		Organise periodic exercises to check the validity of Blue Badges being displayed.	An operation in this area has been designed to commence by March 2015, using national best practice.
Parking Permits	Medium	Organise periodic exercises to check the validity of parking permits being displayed.	Individual referrals are investigated as they arise.
Council Tax Discount & Exemptions	High	Undertake a data matching exercise with Revenues on Single Person Discounts.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise below.
Business Rates	Medium	Conduct a review of all exemptions in place across the borough by category to produce a list to check against data sources such as Charity Commission for those businesses claiming charity status etc.	The threat assessment in this area is being analysed against national best practice, including the use of proactive data matching tools to identify potential issues. This area will be included in the proof of concept stage.
Right to Buy	Medium	Continue to work with the Housing team to check the validity of Right to Buy applications when initial request is made.	The team continue to investigate concerns re individual applications as and when they are referred to them. The new Proactive Investigation Specialist will be reviewing the assessment and referral practice against national best practice, jointly with the Group Counter Fraud & Investigation Manager.
Other Data Matching Exercises			
National Fraud Initiative	High	Investigate high level recommended data matches until the 2012 exercise is complete.	The final report on the 2012 exercise was presented to the Audit Committee in June 2014.

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Investigations			
Referrals	High	Risk assess all reports of fraud and where there appears to be a case to answer, investigate to criminal standards	Refer to Appendix 3