

SSDC COUNTER FRAUD STRATEGY ACTION PLAN

April 2017 – March 2018

In conjunction with the content of SSDC's 'Counter Fraud, Theft and Bribery Strategy', this Action Plan has been written to detail the tasks, subject to resources, which we aim to complete in the period 01st April 2017 – 31st March 2018 and to give and update on progress over the last year. The Action Plan comprises four distinct sections, and within each, the tasks are listed in a descending order in terms of their priority.

Lynda Creek: Fraud and Data Manager Zoe Rodger: Fraud and Data Officer

November, 2017

1)	RAISING AWARENESS OF FRAU	D:		
Ref	Key task		Status	Additional Comments
1.1	SSDC to gain a more detailed aware risks, and those most in need of pro an assessment was endorsed b	to be commissioned. This will enable eness of the severity of corporate fraud ompt counteraction. The need for such by SWAP in a recent fraud audit. upon securing the necessary counter ver mitigation work is identified.	An overall risk assessment is still to be undertaken, however most key areas have had a recent audit by SWAP	Subject to data protection issues being resolved, we hope to have a new trial partnership arrangement with Oxford City Council (OCC) to provide a Fraud Investigation Service. The lack of investigative resource hampers progress on counter fraud work. The first step will be meeting with them to discuss a work plan including an overall risk assessment.
	Section in Fraud Strategy Priority Resources Outcome	 1.2, 1.19, 2.16, 3.8, 5.1 High OCC to carry out assessment to be ag Awareness of the scope and degree of 	corporate fraud risks, as well	as the means to alleviate them
	Performance Measures	When a regular occurrence, compar achieved	ing risk assessments will sl	now the extent of any progress
Ref	Key task		Status	Additional Comments
1.2	webpage to be updated. Both web the Strategy, and clearly state the fraud. Links will be provided to the procedures, including safe report finalised. A single fraud hotline and	on both 'InSite' and the external osites have been brought into line with Council's zero tolerance approach to e range of counter fraud policies and ing routes, as and when they are a dedicated website for Somerset have being taken to ensure that reporting	InSite and the external website are both up to date. A new internal fraud referral form has been introduced to 'streamline' the process of reporting fraud internally	Further work could be done with the Transformation Team to help improve the efficiency of the reporting routes.
	Section in Fraud Strategy Priority	2.1 Medium-High		

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	Resources Outcome Performance Measure	Fraud and Data team in conjunction wi A user-friendly website, which in additi tolerance culture, the duty to report sus Analysis of website content in comparis	ion to listing SSDC Policy, cle spicions, and the expedient re	porting routes available to do so
Ref	Key task		Status	Additional Comments
1.3	all SSDC staff and members Theft and Bribery Strategy, information relating to fraud, duty to report any reasonab	and awareness sessions to be provided. As play a role in the delivery of the Counter-Fraud, the training provided by SWCFP signposts the Council's zero tolerance culture, and the ble suspicions in accordance with procedures istleblowing Policy. The counter fraud training he organisation.	Most staff received Fraud Awareness Session from SWCFP but no progress has been made in devising a similar session for Members. Again this is due to a lack of resources within the Fraud & Data Team.	It may be possible that OCC will be able to deliver training but the priority will be for them to undertake some investigations on some outstanding cases.
	Section in Fraud Strategy Priority Resources Outcome Performance Measure	 2.1, 2.12, 3.25, 3.36 Medium Fraud and Data Manager in conjunction with O Staff and Member awareness of fraud risks, ke Comprehension of the fraud 'red tag' signs suspected etc 	y aspects of policy, and the ap	opropriate procedures to follow
Ref	Key task		Status	Additional Comments
1.4	elected members to be prov the Induction session for new for new members. Using the awareness of the standards appropriate disclosure of int means to report suspicion of	ion for all new employees and all recently vided. Fraud awareness will be provided during w employees, and the Member's Development Strategy as a focal point, the content will raise of conduct expected, the need to make an terests, gifts, and hospitality, the appropriate misconduct, and where to seek further advice.		The Fraud & Data Team will work with the Scrutiny Manager to ensure that counter fraud remains in the induction of all Members and will work with HR on including it as an induction topic for new employees
	Section in Fraud Strategy Priority Resources	2.1, 2.12, 3.12, 3.17, 3.25 Medium Fraud and Data Manager, in conjunction with H	IR and Democratic Services N	lanager

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	Outcome	All new staff and Members will be aware of th suspicions	ne zero tolerance approach to	Fraud, as well as how to report
	Performance Measure	Comprehension of the fraud 'red tag' signs suspected etc plus review of questionnaires at		
Ref	Key task		Status	Additional Comments
1.5	developed. In order to imp raise awareness of what fraudulent acts, the way that examined. As part of this pro- internal and external frauds w and members for considera	publicising Counter Fraud incidents to be rove the methods through which the Council constitutes fraud and the means to report at counter fraud guidance is delivered will be cess, the issues surrounding the publication of vill be brought before both senior management tion, and once agreed, the guidance will be ppropriate as part of the Counter Fraud, Theft	Although included in the updated draft Policy, the loss of the Intern post last November, meant a lack of resource within the Fraud & Data Team to progress finalising the Policy	Traditionally there has been a reluctance to publish any incidences of internal fraud due to possible damage to SSDC's reputation, but this mind set is changing. Acknowledging any weaknesses leads to the formation of better safeguards.
	Section in Fraud Strategy	4.2	SWAP Audit: 2.1a	
	Priority	Medium-Low		
	Resources	Fraud and Data Team (when time permits), in p		
	Outcome	A clear programme of Counter Fraud publication		
	Performance Measure	Assessing the use of publications by comparin indication as to how effective such campaigns	• • •	
2)	ESTABLISHING A POLICY I	FRAMEWORK:		
Ref	Key task		Status	Additional Comments
2.1	revised . The Policy will as SSDC's approach to fraud, the of a position of trust. The Policy	0	An updated draft Policy, the loss of the Intern post last November, meant a lack of resource within the Fraud & Data Team to progress finalising the Policy SWAP Audit: 1.1b	An accessible Counter Fraud Policy is in place, but it has not been updated since 2007, and therefore needs to be brought in line with the Strategy.
	Priority	High		

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	Resources Outcome Performance Measure	Fraud and Data Team in conjunction with the F A relevant and up to date Fraud Policy, which of Staff and members understand the correct pro- find the content of the Policy assists with their of	corresponds closely with the a pocedure to implement upon re	
Ref	Key task		Status	Additional Comments
2.2	management and member measures to undertake shoul corporate fraud is perpetrate specialised investigative guid	b be drafted for approval by both senior s . The Plan will first detail the appropriate d corporate fraud be discovered, and then, as ed in a variety of ways, the Plan will provide ance which corresponds to the particular type e correct operating protocols and appropriate yed.	Response Plan have been included into the Counter Fraud Policy so a separate Response Plan may not be	been completed. Before completion, the appropriate investigative resources must be determined for inclusion into
	Section in Fraud Strategy Priority	1.5, 1.9, 4.24 High	SWAP Audit: 1.1b	
	Resources	Fraud and Data Team		
	Outcome Performance Measures	A comprehensive reference point which provide Evaluation as to the effectiveness of the Fraud		
	renormance weasures		Response Flatt tollowing any	

Ref	Key task		Status	Additional Comments
2.3	Sanctions Policy to be draft Members. The Sanctions Policy Counter Fraud Policy, will de applied in relation to a list of case. The Policy will also er	Counter Fraud Policy (see 2.2) a Formal ted for approval by Senior Management and licy, which has now been incorporated into the etail generally how specific sanctions are to be criteria to be taken into consideration in each issure that the action taken corresponds to the the fraud, and that any necessary financial of redress are achieved.	Although included in the updated draft Policy, due to a lack of resource in the Fraud & Data Team, no further progress has been made in the last year.	Though the application of the appropriate sanctions is relatively consistent in relation to the type of fraud discovered, there is no formal Sanctions Policy to demonstrate the procedures currently in place.
	Section in Fraud Strategy	1.5, 2.1, 4.21	SWAP Audit: 1.4a	
	Priority	Medium-High		
	Resources	Fraud and Data Team in association with Lega		
	Outcome	A clear and consistent policy on the application		
	Performance Measure	Review of the policy so as to ensure sanctions	are applied evenly, and to furt	ner safeguard the Council
Ref	Key task		Status	Additional Comments
2.4	Whistleblowing Policy has no	Whistleblowing Policy to be revised. The ow been revised and approved and has been es, members, contractors and third parties so	The current Whistleblowing Policy is available on InSite and the public website.	The Policy was revised and is due to be reviewed in July 2018.
	that the procedures within be	come as widely adopted as possible. There will ote the Policy, including references to it in the		
	that the procedures within be be continued effort to promo		SWAP Audit: 2.2a	
	that the procedures within be be continued effort to promo Counter Fraud Policy Section in Fraud Strategy Priority Resources	te the Policy, including references to it in the 1.15, 2.1, 2.8, 3.15, 3.20, 4.3, 4.8 Medium-High Fraud and Data Team, in correspondence with	the Fraud and Data Manager	
	that the procedures within be be continued effort to promo Counter Fraud Policy Section in Fraud Strategy Priority Resources Outcome	te the Policy, including references to it in the 1.15, 2.1, 2.8, 3.15, 3.20, 4.3, 4.8 Medium-High Fraud and Data Team, in correspondence with A concise and relevant Whistleblowing Policy w	the Fraud and Data Manager hich corresponds with the cor	
	that the procedures within be be continued effort to promo Counter Fraud Policy Section in Fraud Strategy Priority Resources	te the Policy, including references to it in the 1.15, 2.1, 2.8, 3.15, 3.20, 4.3, 4.8 Medium-High Fraud and Data Team, in correspondence with	the Fraud and Data Manager hich corresponds with the cor ing matters forward (not jus ign out, in particular, any vulr	t fraud allegations) of concern.

2.5	keep them informed of co obligated to make certain the are in place, and according delivered to them. The Plan v initiatives in the previous six r Plan will also detail initiative	me to be presented to Audit Committee to unter fraud work. The Audit Committee are at counter fraud and corruption arrangements ly, an annual Fraud Programme should be will assess the effectiveness of corporate fraud months, and any areas in need of revision. The s for the next six months, including how the focused towards the most severe fraud risks.		A lack of resource added to by the demands of Transformation and other work streams delayed the preparation of Annual Fraud Programme.
	Section in Fraud Strategy Priority Resources Outcome Performance Measure	1.5, 1.21, 2.12, 5.2 Medium Report to be prepared and presented by the F An Annual Programme which details the succe Once an initial report is drafted, future success	sses in countering fraud, and	the areas to be revised
Ref	Key task		Status	Additional Comments
2.6	list past incidences of corpicture of fraud incidents and fraud took place, the methors afeguards needed to stop a and by critically examining the discovered, a clear indication	of Fraud Occurrences to be established to porate fraud. This would provide a complete risks across the Council, detailing what type of d(s) through which it came to light, and the a reoccurrence. By sharing the lessons learnt, he procedures followed when fraud has been on of risks will become apparent, as will the ctive, and the practices requiring amendment.	Although this would be useful information it has proved difficult to secure the information about previous frauds, and so the decision was made to focus on following up on previous audit recommendations where these are known.	An overview of fraud occurrences can be maintained in the future. This task will be removed from the next Action Plan and consideration given to how future incidents of corporate fraud can feed into changes in work practices
	Section in Fraud Strategy Priority Resources Outcome	1.7, 1.20, 2.2 Medium-Low Case files to be provided by Service Managers A Spreadsheet detailing historic instances of fra	aud for the use of the Fraud ar	nd Data Manager
-	Performance Measure A more comprehensive picture of fraud risks, minimising the risk of similar fraud reoccurring PROCEDURAL CHANGES: Fraud reoccurring			
3)				

3.1	include specific reference membership of the CGG shows so that she is in the commu enable direct awareness as across different departments	Governance Group (CGG) to be extended to e to counter fraud work. At such time, uld be granted to the Fraud and Data Manager, nication loop on fraud related issues. This will to the extent of fraud risks both within and s, as well as how such matters fit with other G will also have a chance to be briefed by the relevant fraud risks.	The Monitoring Officer and S151 Officer felt that it was not necessary for the Fraud and Data Manager to be a formal member of this Group. There would be two-way communication between the CGG and the Fraud and Data Manager on issues relevant to fraud (and data) matters.	Any issues can be sent to the CGG, and as and when this is necessary will provide a platform to raise the general issue surrounding the CGG. This task will be removed from the next Action Plan No doubt as part of Transformation the role of CGG will be reviewed so it is 'fit for purpose'.
	Section in Fraud Strategy	2.11	SWAP Audit: 1.2a	
	Priority	High		
	Resources	Assistant Director – Legal and Corporate Servi		
	Outcome Performance Measure	Fraud is specifically addressed by Senior Mana CGG has a wider remit and membership, demo	•	•
	r enormance measure	COO has a wider rennt and membership, dent		on or counter-fraud
Ref				
	Key task		Status	Additional Comments
3.2	The Risk Management Syst fraud risks are integrated operational risks by each se under one section on the syst of corporate fraud being deve	d. Rather than being listed amongst other ervice, corporate fraud risks should be located etem. The current system hinders a true picture eloped, but if all risks associated with corporate gether, then a clearer and more accurate be made.	There remains an inherent weakness in the TEN system in only allowing each risk to be in one category.	
	The Risk Management Syst fraud risks are integrated operational risks by each se under one section on the syst of corporate fraud being deve fraud can be brought tog assessment of such risks can Section in Fraud Strategy	 d. Rather than being listed amongst other rivice, corporate fraud risks should be located atem. The current system hinders a true picture eloped, but if all risks associated with corporate gether, then a clearer and more accurate be made. 3.3, 4.4, 4.5 	There remains an inherent weakness in the TEN system in only allowing each risk to be in one	It is hoped that through the Transformation Programme TEN will be replaced and that the 'flagging' of fraud risks will be considered by the 'Build
	The Risk Management Syst fraud risks are integrated operational risks by each se under one section on the syst of corporate fraud being deve fraud can be brought tog assessment of such risks can Section in Fraud Strategy Priority	 d. Rather than being listed amongst other ervice, corporate fraud risks should be located etem. The current system hinders a true picture eloped, but if all risks associated with corporate gether, then a clearer and more accurate a be made. 3.3, 4.4, 4.5 Medium-High 	There remains an inherent weakness in the TEN system in only allowing each risk to be in one category.	It is hoped that through the Transformation Programme TEN will be replaced and that the 'flagging' of fraud risks will be considered by the 'Build Team'.
	The Risk Management Syst fraud risks are integrated operational risks by each se under one section on the syst of corporate fraud being deve fraud can be brought tog assessment of such risks can Section in Fraud Strategy	 d. Rather than being listed amongst other rvice, corporate fraud risks should be located atem. The current system hinders a true picture eloped, but if all risks associated with corporate gether, then a clearer and more accurate be made. 3.3, 4.4, 4.5 Medium-High Fraud and Data Manager, with services manage Fraud & Data Manager has a detailed aware potential risks they face from fraud, and what e 	There remains an inherent weakness in the TEN system in only allowing each risk to be in one category. SWAP Audit: 1.2a gers to complete the procedura eness of the preparedness of each department is doing to mit	It is hoped that through the Transformation Programme TEN will be replaced and that the 'flagging' of fraud risks will be considered by the 'Build Team'.
	The Risk Management Syst fraud risks are integrated operational risks by each se under one section on the syst of corporate fraud being deve fraud can be brought tog assessment of such risks can Section in Fraud Strategy Priority Resources	 d. Rather than being listed amongst other rivice, corporate fraud risks should be located stem. The current system hinders a true picture eloped, but if all risks associated with corporate gether, then a clearer and more accurate be made. 3.3, 4.4, 4.5 Medium-High Fraud and Data Manager, with services manage Fraud & Data Manager has a detailed awar 	There remains an inherent weakness in the TEN system in only allowing each risk to be in one category. SWAP Audit: 1.2a gers to complete the procedura eness of the preparedness of each department is doing to mit	It is hoped that through the Transformation Programme TEN will be replaced and that the 'flagging' of fraud risks will be considered by the 'Build Team'.

3.3	commissioned by SSDC on this would enable the Fraud audit recommendations cond the Assistant Director – Fin produced by SWAP as a procedures, policies and sa insight into departmental met	ager to be able to access SWAP Reports issues related to fraud. Linking with task 2.6, and Data Manager to gain awareness of all terning counter fraud issues. As things stand, hance receives a copy of every audit report result of their analysis into the Council's afeguards. Inclusion would provide detailed asures to prevent fraud, as well as the cross- as an organisation to mitigate losses.	Although a list of some recommendations re fraud issues made in recent audit reports was obtained a lack of resource has meant only very limited progress has been made on checking on their implementation.	A view into whether and how they have been implemented is needed however this task is subject to resources being secured. Some councils have procured an electronic checking system to ensure audit recommendations are implemented. Perhaps the Transformation 'Build Team' can consider if this option is feasible.
	Section in Fraud Strategy	2.1, 2.9, 2.11 3.2, 3.4, 4.5		
	Priority	Medium		
	Resources Outcome	Fraud and Data Team	new out froud through concer	to CMAD recommendations
	Performance Measure	Thorough understanding of measures taken to recommendations from SWAP are implemented	• •	
		the risks of not doing so properly assessed		they are not being followed and
Ref	Key task		Status	Additional Comments
3.4	does not have an adverse i an assessment will give due o residents of South Somers accessible external document	devised so that delivery of the Action Plan mpact upon protected characteristics. Such consideration to the varying requirements of the set. This will include measures to ensure nts, inclusive in-house training, and policies/ verse impact upon protected characteristics.	Housing Benefit referrals are now out of our hands, but we will review other referrals and investigations with a view to equalities where such details are provided or identified.	There will be ongoing communication with the officer handling equalities issues to ensure that any adverse effects resulting from the completion of tasks are made apparent and then removed, mitigated or managed
	Section in Fraud Strategy	1.20		
	Priority	Medium-Low		
	Resources	Fraud and Data Team in conjunction with office	· ·	
	Outcome	The successful undertaking of the Action Plan,	without disadvantaging protect	cted characteristics

Performance Measure Assessment of the monitoring system by the Equalities Officer and the Equalities Steering Group

PROACTIVE COUNTER FRAUD INITIATIVES: 4) Key task Additional Comments Ref Status The county-wide fraud hotline and dedicated website for the reporting Continues to work well for The hotline and the website 4.1 'somersetfraud.org.uk' have of all types of corporate fraud to be reviewed. It was recognised that the public. A new internal enabling people across the county to report fraud in one place could lead to been established, with the legal fraud referral form has a substantial reduction in corporate fraud losses, and so a variety of team receiving referrals and been introduced which has mediums have been put in place for those wishing to register their helped 'streamline' forwarding them on as the suspicions of malpractice. To ensure effectiveness, the hotline and website process of reporting fraud appropriate. The Fraud Forum need to be reviewed, in terms of the number of users, the accessibility of the has not met since the Chair internally. The form is services, and the quality of the data generated through fraud referrals. available on InSite and is changed jobs 9 months ago and a replacement is yet to be being used. found. The key issue is lack of investigative resource for nonhousing benefit cases. This gap we hope to plug using Oxford City Council's Team. Section in Fraud Strategy 1.15, 2.1, 4.3, 4.7 Priority Hiah Resources These need to be established –(hopefully Oxford City Council's Investigative Team can help to some degree). Resources to administer Hotline and website need to be addressed post Transformation

Fraud hotline and website working well

Number of referrals and quality of data received

Outcome

Performance Measure

Ref	Key task		Status	Additional Comments
4.2	Future resources to receive referrals through the fraud hotline and website to be considered. Prompted by the Prevention of Social Housing Fraud Act (2013), which gives councils sole power in the prosecution of tenancy offences, a campaign known as 'Know a Cheat in Your Street' was run by the Somerset Tenancy Fraud Forum. In order to ensure the success of this campaign, consideration needs to be given to the resources in place to handle fraud referrals, as although the Investigations team at SSDC currently receive them, they are due to transfer to DWP in the near future.			For the time being, SSDC staff are handling all Somerset referrals, and passing them to the appropriate local authority or housing association.
	Section in Fraud Strategy	1.5, 1.18, 1.19, 3.10, 5.2		
	Priority Resources	Medium-High See 4.1 -		
	Outcome	Arrangements to ensure that the data generate	d through fraud referrals conti	nues to be investigated
	Performance Measure	Successful investigation of hotline and website	0	5
Ref	Key task	• • • • • • • • • • • • • • • • • • •	Status	Additional Comments
4.3	key areas of fraud risk. In	investigative reviewed to be conducted in addition to the regular audits undertaken by the SWCFP have been contracted to conduct eral specific at risk areas.		Grant Fraud and Insurance Fraud have been the subject of recent audits.
	I) Social Housing Ten	ancy Fraud: The common need register has a rea at risk from fraud,	SWCFP presented an Interim Report on findings	The need for a further procurement audit has been
	5	Procurement fraud is a significant area of loss,	from their Contract	identified from the Investigative
		ts and exemptions: to evaluate the extent of	Management and ICT Investigative Review. The	review into contract matters. This work will be progressed
	IV) Grant Fraud: before a	and after the awarding of a grant and to assess ventative measures in place at both of these	reports has been reviewed by the Fraud and Data Manager but lack of	when resources are secured.
	•	as been seen nationally that significant sums of to insurance fraud.	resource has meant there has been no further progress on addressing	

	issues identified (other than bringing them to the attention of the relevant Assistant Director). Further work is needed on these issues. The Revenues and Benefits Manager has carried out some compliance work on council
	tax with funding secured by the Somerset Councils
Section in Fraud Strategy	2.1, 3.7, 3.19 , 4.1, 4.6
Priority	Medium
Resources	Need to establish resources for this work. SWAP audit capability depends on the number of days available in the audit plan
Outcome	Evaluation as to the effectiveness of safeguards in place to prevent grant fraud from occurring
Performance Measure	Identification of the areas and safeguards relating to corporate fraud which are in need of revision

Ref	Key task		Status	Additional Comments
4.4	website 'somersetfraud.org all Somerset authorities, all in Fraud Investigation Team. The issues, so discussions with o	ngaged in the fraud referral process on the puk'. Though capable of receiving referrals in normation will initially be directed to the SSDC is cannot continue indefinitely due to resource other councils in Somerset must take place to priately, and to ensure resources for the future.	No progress as yet, although not a high priority as in reality virtually all the referrals that have come through are relating to South Somerset.	The loss of the Chair of the Fraud Forum has meant there have been no meetings in the last 9 months at least. No replacement Chair has emerged so currently there is no impetus from the other Somerset Councils to increase the usage of the website and phone line so there are no issues re capacity in receiving and logging the referrals. The prime gap for SSDC is the lack of an internal Investigative resource to which we can refer cases when detailed investigation is needed. The Revenues and Benefits Team have been doing some initial checks into council tax allegations but further investigative work cannot be progressed. It is planned to help bridge the gap by using Oxford City Council's investigative team once all contractual and data protection issues have been resolved.
	Section in Fraud Strategy Priority	1.15, 2.1, 4.3, 4.7 Medium		
	Resources	Senior Management of each of the Somerset C	councils to establish the availa	ble resources in their authority
	Outcome	Resources for handling county wide referrals es	stablished at other Somerset (Councils
	Performance Measure	Further promotion of the website, and the ease	with which the data reaches t	he appropriate authority

Ref	Key task		Status	Additional Comments
4.5	financing of further resc Considering that the principal to the County Council, SSE investigate the fraudulent rec SCC, as it is they who princip tax fraud has not traditional prosecutions rarely occurrin localised administration of cou	et County Council to be held over the burces to investigate council tax fraud. sum (just over 70%) of council tax levied goes of will discuss the financing of resources to eipt of council tax discounts or exemptions with bally benefit from any sums recovered. Council y been treated as such by the Council, with ng. However, the shift from centralised to uncil tax has meant that financial losses are felt so SSDC should reassess its response.	The Somerset Benefit Managers have sought financial contribution from the major precepting authorities for additional resources to aid in identifying errors in Council Tax Discounts and Exemptions.	The Revenues and Benefits Managers in the Somerset Districts/Borough have secured some funds from Somerset County Council to do some compliance and data matching work e.g. Single Person Discount reviews
	Section in Fraud Strategy	3.7		
	Priority	Medium-Low		
	Resources	Senior Management to establish the resources		
	Outcome	A schedule of meetings, undertaken with the ai		
	Performance Measure	A clear decision as to the provision of further re	esources, as well as the attitud	le SSDC are to adopt