

Somerset County Council

Audit Committee – 30 January 2020

Anti-Fraud and Corruption Review

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Cabinet Member: Cllr Mandy Chilcott, Cabinet Member for Resources

Division and Local Member: All

1. Summary/link to the County Plan

- 1.1.** This report is the annual review of all the measures that the County Council has undertaken in the last year aimed at the prevention, detection and reporting of fraud and corruption. This is in accordance with our Financial Procedures and acknowledged best practice
- 1.2.** Anti-fraud and corruption work forms an important part of our corporate governance and internal control framework. With assistance from trained SWAP staff, the council compares systems and processes against typical fraud target areas for fraud, and against national trends and guidance.

- 1.3.** The officers' conclusion of this review is that the County Council has a sound framework in place, although more could be done to raise awareness. However, the council continues to see a small number of fraud allegations, some leading to more formal investigations from SWAP, (and potentially reporting to Action Fraud). This review and these incidents need to be strongly considered when the Audit Committee sets its Internal Audit Plan for 2020/21 at its March 2020 meeting.
- 1.4.** The Council has an established Anti-Fraud and Corruption Policy and Strategy with Annexes covering Anti-Bribery and Money Laundering and this is subject to annual update and approval by this Committee. This Policy sets out what actions the Council proposes to take over the medium-term future to continue to develop its resilience to fraud, corruption and other financial irregularity. It also covers the key responsibilities with regard to fraud prevention, what to do if fraud or financial irregularity is suspected and the action that will be taken by management.

- 1.5.** Part 3 of the Criminal Finances Act 2017 creates a new corporate criminal offence where a corporate entity fails to prevent the facilitation of tax evasion by its staff, agents and contractual associates. Following an advisory review carried out by SWAP audit during 2018/19 a new Anti-Tax Evasion policy has been developed that reflects the new legislation. This was considered by the Corporate Governance Board in December 2019. Specifically, the policy endorses the existing zero tolerance stance on fraud and corruption and provides guidance to staff and others on action to prevent or report on tax evasion or the perception of tax evasion, and to emphasise the need for awareness. Following the approval of this policy the Council needs to complete a corporate level assessment of the risk posed by tax evasion facilitation in order to produce an effective prevention strategy. This is currently being progressed through the Strategic Risk Management group and this Committee will be asked to approve the new Anti-Tax Evasion policy at the next meeting

2. Issues for consideration

- 2.1.** The Committee is asked to look at the current national trends and to consider and comment on the specific anti-fraud and corruption measures undertaken and planned locally (section three).
- 2.2.** The Committee is asked to re-confirm the Anti-Fraud and Corruption Policy as set out in **Appendix A**, and the subsidiary Anti-Bribery and Anti-Money Laundering policies (**Appendix B**)
- 2.3.** The Committee is invited to comment on the local fraud cases in **Appendix C**.

3. Background

- 3.1 National commentaries and support available**
Many organisations now provide guidance / information about combatting public sector fraud, and several publications are included in the Background Papers section of this report (in a very approximate order of relevance and most recent).
- 3.2** The Chartered Institute of Public Finance and Accountancy (CIPFA) has taken on a larger role to guide counter fraud work in the public sector, with a dedicated Counter Fraud Centre since 2014. It has published a **“Code of practice on managing the risk of fraud and corruption”**. This Code is designed to “support organisations seeking to ensure they have the right governance and operational arrangements in place to counter fraud and corruption.” It has also supported the latest Fighting Fraud and Corruption Locally (FFL) tri-annual strategy entitled **“The local government counter fraud and corruption strategy 2016-2019”** that is currently being reviewed, and CIPFA continues to produce its own **“Fraud and Corruption Tracker”** the latest being the **“Summary Report 2019”** which summarises the national position on many types of fraud through surveying local authorities.

- 3.3** The Cabinet Office now has responsibility for the National Fraud Initiative (NFI) and has recently produced a detailed report on work undertaken under the NFI and potential losses and recovery achieved. The Council's local work under the most recent NFI data is set out below.
- 3.4** The European Institute for Combatting Corruption and Fraud (TEICCAF) "exists to protect the public purse and voluntary sector funds from corruption and fraud throughout Europe". It produced a review entitled "**Protecting The English Public Purse 2016**".
- 3.5** The Centre for Counter Fraud Studies based at the University of Portsmouth produced the "**Annual Fraud Indicator 2017**", which attempts to re-quantify the likely loss through fraudulent activities by each category of fraud.
- 3.6** Most of these publications are based on surveys and estimated costs of fraud by sector (private, public, individual, charity etc). Whilst the estimates are not always consistent, there is strong correlation as to the areas where fraud is perpetrated against, say, local authorities, and general consensus as to new and emerging risks. For example, many commentators consider that for the public sector in general the three greatest areas of perceived fraud risk are procurement, council tax single person discount (SPD) and adult social care.
- 3.7** There is also guidance from most publications as to how to combat fraud locally. The majority advise following a thought process like the CIPFA's 'Acknowledge Responsibility – Identify Risks – Develop A Strategy – Provide Resources – Take Action' process.
- 3.8** **The critical need to acknowledge fraud risks**
A common theme again running through the national commentaries remains, in that organisations have difficulty in accepting that they are a fraud target and that there is a risk of significant loss as a result.
- 3.9** Work has been previously undertaken at the Council with key groups, such as reviewing anti-money laundering with the exchequer staff who receive payments on behalf of the County Council and the Treasury and Investments team. This type of activity will need to continue. On-going support from the Finance business partners also helps senior officers and budget holders in recognising rogue transactions that may need reporting and investigating. It is critical that SWAP's time continues to focus to key systems (financial or operational) where there is greater risk of fraud.

The Council also works closely with other partners in managing fraud risk. The Council is currently working with the Clinical Commissioning Group (CCG) who are leading a review of the fraud risk associated with direct payments being made to individuals and families for continuing care. These are contracts managed by the Local Authority on the CCG's behalf.

3.10 Estimating the cost of fraud

All the national commentators agree that fraud against the public sector remains “big business” and that combatting it should remain a high priority for local authorities and public sector organisations.

3.11 CIPFA’s Tracker Report 2019, the most recent survey, estimates that nearly 71,000 frauds were detected or prevented across local authorities in 2018/19, with a total value of close to £253m, (an average value per fraud case of approximately £3,600). This is a reduction from the previous year (2017/18) where the estimated value was £302m. The decrease is said to be largely attributable to the successful work by public authorities in housing. Serious and organised crime figures have also seen a reduction with 24 cases of serious and organised crime reported compared to 56 in the previous year (2017/18).

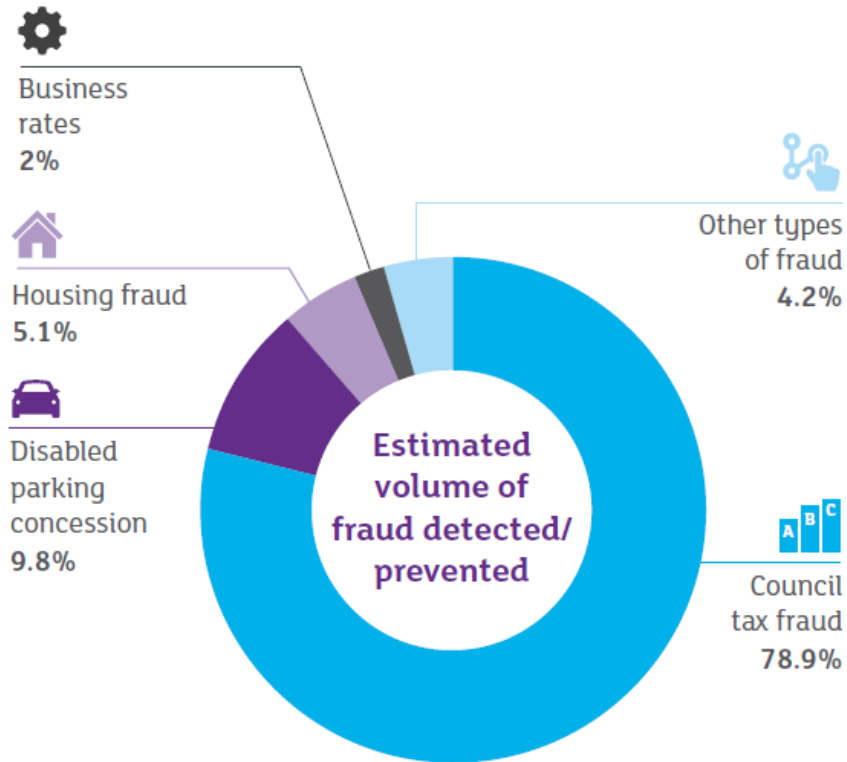
3.12 Obviously, it should be noted that some organisations are markedly more susceptible to fraud risk than others depending on their functions, e.g. housing tenancy and housing benefit fraud will only impact on housing authorities.

3.13 Fraud risks to Somerset County Council

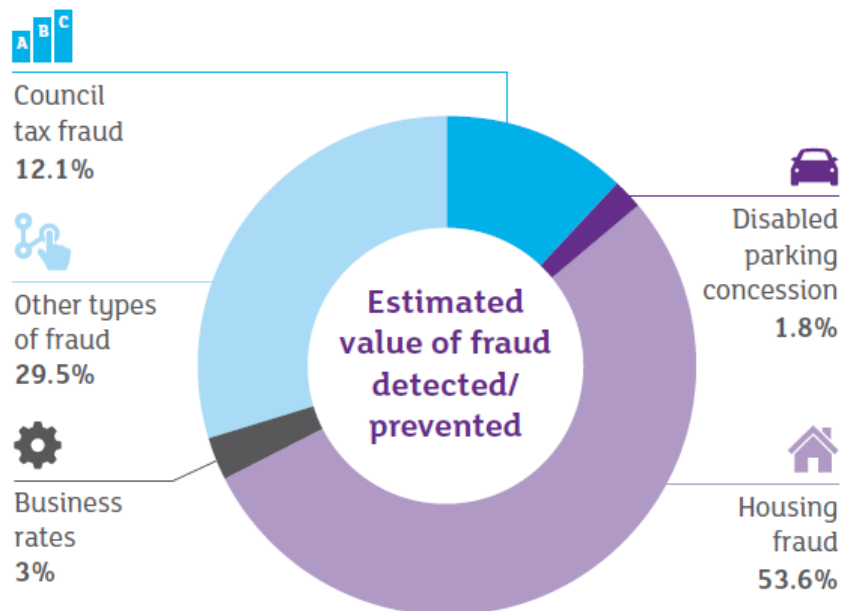
The pie charts below show detected fraud by volume, and then detected fraud by value for all local authorities, showing the relative size and impact of certain categories of fraud. This is taken directly from CIPFA’s 2019 fraud survey of local authorities (being the most recent of all such surveys, and directly from local authority respondents).

3.14 Broadly, these figures are consistent with previous year’s surveys however there has been a slight proportional change between Council Tax which has increased from 70% to 78.9% and Blue Badge which has reduced from 17.8% to 9.8% by volume in the 2018 survey. Emerging trends and key points to note are discussed in more detail below. These results are from all local authorities (County, District, Unitary, Metropolitans, London), and so again not all fraud categories are direct fraud risks to this Council.

3.15 Chart 1: Detected fraud by volume



3.16 Chart 2: Detected / prevented fraud by value



3.17 The area that has grown the most in the last year is council tax single person discount (SPD) with an estimated increase of £3.6m since 2017/18.

3.18 The CIPFA survey reports that the primary perceived issue that respondents think need to be addressed to tackle the risk of fraud and corruption effectively is capacity and respondents expect to increase the number of counter fraud specialist staff by 9% over the next year. It must be remembered that the responders included District and Unitary authorities with Council Tax and housing responsibilities, and as the charts show, these are by far the largest proportion of detected cases.

3.19 Many of the “traditional” fraud risks are not directly applicable to this Council, such as housing tenancy and benefits, welfare and Right To Buy frauds. However, there are several key findings that come from the CIPFA survey, that do have direct implications for the Council in terms of specific fraud risks.

3.20 **Council Tax fraud.** This remains the overwhelmingly largest area in terms of number of frauds reported. Traditionally, of the frauds detected, Single Person Discount fraud is by far the most common.

3.21 In 2018/19 the total number of detected and prevented fraud for council tax fell, with no significant change in the proportion of type of frauds detected and prevented. However, the average value of the frauds, especially for SPD has risen resulting in an increase in the total value. Whilst this fraud is not directly targeted at the County Council, it obviously bears the greatest financial loss.

3.22 **Table 1: Estimated council tax fraud**

	2016/17		2017/18		2018/19	
	Volume	Value	Volume	Value	Volume	Value
SPD	50,136	£19.5m	46,278	£15.8m	44,051	£19.4m
CTR	6,326	£4.8m	8,759	£6.1m	8,973	£7.2m
Other	674	£1.1m	2,857	£4.5m	2,831	£4.0m
Total	57,136	£25.5m	57,894	£26.3m	55,855	£30.6m

3.23 All Somerset authorities have been approached by Powys Council, who are offering a service to tackle Single Person Discount and wider frauds as a potential second stage. At present, details of the proposal must be treated as commercially confidential. Officers are currently considering this proposal, alongside having initial discussions with SWAP who are looking to extend its counter fraud work starting in 2020/21 to see how this can benefit this council.

3.24 **Business rates fraud.** Typically, this is simply direct evasion of payments due, or falsification of information to secure exemptions or relief. Again, whilst not directly perpetrated against the funding the Council receives from Business Rates is impacted.

3.25 **Blue Badge fraud.** The value of fraud is very difficult to calculate, as it relates to lost parking revenues. Even in the event of a successful prosecution, there is no direct financial recovery that can be made, and any fine paid by the individual goes to the court, although some costs can be recovered. CIPFA estimates that the cost per instance of Blue Badge fraud for rural counties has increased from £449 per instance to £657 per instance. SWAP carried out an audit in 2018/19 to assess whether the Council effectively manages the Blue Badge Scheme in accordance with Department of Transport statutory criteria and minimises the risk of fraud and misuse. The new Customer Management System was found to provide an adequate level of control and a reasonable assurance opinion was given.

3.26 Guidance issued by the Department for Transport and the Ministry of Housing, Communities and Local Government have issued guidance that includes new criteria which extends the blue badge scheme to those with less 'visible' disabilities such as dementia or anxiety disorders. The extended criteria is one of the biggest changes to effect the scheme in nearly 50 years and came into effect in August 2019. This coincides with the launch of a new task force to aid local authorities in the prevention and detection of blue badge fraud, which indicates that this fraud is an area of increasing risk.

3.27 **Pension fraud.** Pension fraud typically arises as a result of "Failing to disclose information" under the 2006 Fraud Act, where the Fund is deliberately not notified of the death of a beneficiary. In these situations, a pension will continue to be paid into the bank account of the beneficiary and accessed inappropriately. The National Fraud Initiative (NFI), introduced by the Cabinet Office, is a useful tool in recovering overpayments of pensions.

The Councils Shared Service Pensions Administration Team, Peninsula Pensions participates in the NFI, which matches electronic data within and between public and private sector bodies to prevent and detect fraud. This helps to ensure that pensions are not paid to beneficiaries who are no longer entitled to receive such payments, and that occupational income is being declared appropriately for benefit applications.

3.28 Concessionary Travel fraud. A method of committing fraud on concessionary travel is to deliberately not notify the council of the death of a concessionary pass holder and to continue to use, (and even re-apply in some cases!) for a pass. The National Fraud Initiative will allow the Council to update records periodically. This is another area where information is critical and good progress is being made implementing a range of controls as recommended by SWAP. In addition, with our support major operators have implemented new ticket machines which enable us to monitor concessionary patronage. A regime of spot check controls is in also in place, and claims are being reconciled back to data for the majority of operators. This work has been implemented by a new concessionary fares officer post within the Transporting Somerset operational structure. The Transporting Somerset Team continue to work positively with operators to improve the timeliness and quality of the data it submits to the Council.

3.29 Procurement fraud. This category of fraud is considered the highest fraud risk area nationally. Even with a small number of cases, because of the nature of fraud, the potential costs in each case to authorities is substantial. This can be at any stage of the procurement of goods and services to an authority, such as through tendering, or even during the contract monitoring stage after a contract is let. Nationally 12% of the 125 reported cases were reported as 'insider fraud' where officers are involved in the perpetration of the fraud and 5% classified as serious and organised crime.

3.30 Table 2: Estimated procurement fraud

2016/17		2017/18		2018/19	
Volume	Value	Volume	Value	Volume	Value
197	£6.2m	142	£5.2m	125	£20.3m*

*Please note this figure is attributable to mainly one organisation and though it is not comparable to other respondents, it shows the scope for fraud in this area.

3.31 Somerset County Council has a very well-defined procurement process for awarding large contracts, using a dedicated procurement portal, and as such has a level of protection against procurement frauds that provides strong assurance. The Council also adheres to its Contract Procedure Rules and Standing Orders for the buying, renting and leasing of Goods, Services and Works.

There are also internal controls with segregation of duties that mitigate the risk of 'insider fraud'. The amount of potential loss only serves to emphasise the need for compliance with our prescribed procurement processes.

3.32 Adult social care fraud. Adult social care fraud can happen in a number of ways:

- Residential homes continuing to invoice for residents who have died;
- Residential homes or case workers claiming money for time that they had not worked with those needing care, or where they had failed to provide the full level of care that a local authority had requested;
- Direct payments not being used to pay for the care of a vulnerable adult, or for expenditure that it should not be used for;
- Direct payments being claimed in a way to evade tax liabilities, such as when care is provided by an individual;
- Deliberate failure by individuals with a personal budget to declare a change in circumstances, either health or financial;
- Defrauding the vulnerable adult of their direct payments they were legitimately entitled too, usually by a friend or relative.

The fraud risk on adult (and children's) social care has increased through the use of direct payments to individuals to arrange their own social care needs. In 2018/19 there were a small number of very high value frauds identified in two councils which result in an overall increase in adult social care fraud value. However, the overall number of frauds identified or prevented has followed the trend in a steady decline. A review of Children's Direct Payments is included within the last quarter of the 2019/20 internal audit plan.

3.33 Other frauds that could directly impact against the Council include:

Insurance fraud for false claims (The Councils Insurance Team has implemented the Claims and Underwriting Exchange (CUE). CUE is a central database of motor, home and personal injury/industrial illness incidents reported to insurance companies, which may or may not give rise to a claim).

There have been no investigations at Somerset in recent years, and with CUE the risk is considered relatively low. It is planned to include Insurance claims within next year's Internal Audit Plan to provide assurance within this area.

Payroll fraud for unworked hours and expenses. CIPFA report that up to 40% of payroll cases involved insider fraud. The Council can take assurance from the 'Reasonable Assurance' from the 19/20 SWAP payroll audits and the satisfactory outcome of the IR35 follow-up audit carried out in 2018/19. In 2020/21 a review of employee expenses will be undertaken to provide further assurance.

Mandate fraud claiming to be from suppliers and asking us to change their bank account details (The Council has controls in place to check any such requests, and this is a rather unsubtle and easily combatted fraud attempt). Cases of mandate fraud are notably on the decline in recent years.

3.34 **SWAP audit work on fraud**

The Internal Audit Plan makes provision for anti-fraud work in several ways:

- Firstly, the auditor will be looking for key controls and processes in every audit and would flag up any concerns that arose in the course of their work – be it the possibility of loss through error, or the potential for fraudulent activity.
- Secondly, we include a number of what are termed "key control audits" looking at our financial and related systems. In the 2019/2020 Internal Audit Plan, this includes audits on Accounts Payable (Creditors), Payroll, Treasury Management, and Debt Management.
- Thirdly, each year, as part of the Internal Audit Plan, we include at least one fraud-themed audit, looking at how well protected the County Council is from certain specific fraud risks. This is informed from a number of sources – such as national emerging themes, audit recommendations / investigations or officer request.

3.35 In addition, a Cash Handling audit was included in the 2019/20 Plan, given that this represents an area with a high inherent risk of fraud and error.

3.36 Fourthly, there is also capacity within the Internal Audit Plan for trained auditors to investigate individual allegations as they arise. As ever, SWAP has been very flexible in freeing up resources and in providing an auditor to investigate individual cases. A summary of these can be found at **Appendix C** of this report.

3.37 With the National Fraud Initiative work also about to recommence (paragraph 3.41 below), and the proposed audits for the 2020/21 Plan, officers believe that work has either happened recently, or will take place imminently to review all the main fraud risks facing Somerset County Council.

- 3.38** The tax evasion audit carried out in 2018/19 proposed a number of future audits to provide assurance over some potentially higher risk areas. Two of these audits have been carried out as part of the 2019/20 internal audit plan. The first was a school purchasing theme review and as well as the regular payment process for expenditure, this reviewed how schools control their CIS invoices, imprest funds and procurement cards. A reasonable assurance opinion was provided. An audit of Schools Unofficial Funds is also scheduled for Quarter 4 of 2019/20.
- 3.39** Completion of all these actions will provide the Council with a stronger position to demonstrate reasonable preventative procedures should a tax evasion issue be raised with HMRC.
- 3.40** **National Fraud Initiative (NFI)**
Somerset County Council continues to participate in the Cabinet Office's National Fraud Initiative (NFI), along with 1,200 other organisations. This scheme is a cross-authority exchange of information between public bodies, with its own highly secured website, which is run on a 2-year cycle. Participating authorities provide information from their primary systems to the NFI for analysis. This information includes, for example payroll, pensions, creditors, Blue Badge holders, insurance claims, vendors and payments made, concessionary travel passes and personal budgets.
- 3.41** Members are reminded that whilst Somerset County Council must comply with all legislation and guidance on the use of data, (such as the General Data Protection Regulation (GDPR) which has been to Audit Committee previously), the Data Protection Act 2018 still allows "competent authorities" to use data for the detection of fraud. The NFI work does not require the consent of the individuals concerned.
- 3.42** The Cabinet Officer NFI teams compare our data both internally and with information supplied by other organisations and highlights potential errors or frauds. For example, it compares staff on our payroll and pensions, who also appear on other authorities' payroll and pensions records for the same period, or people on our pensions or concessionary fares lists for whom the Department of Works and Pensions have a deceased date.
- It also looks at where we have made the same or similar payments to the same supplier over time, or where the VAT on payments is unusual. Once the NFI have done their comparative work, we receive "datasets" back onto our secure system. A dataset is effectively a list of all potential "matches" or concerns that the NFI's work has thrown up in a certain area e.g. pensions, which were the largest increase in potential "matches" and monies recovered in the previous exercise.

3.43 Access to the NFI website is highly restricted, but a few staff within each service area in the County Council then investigate the potential matches for any suspicious activity in their own specialism. Where the potential match is with another authority, there is a secured electronic communication within the other authority to check details and investigate in a collaborative manner.

3.44 Our latest information was uploaded to the National Fraud Initiative database in late 2018. We have received the output from the NFI database to permit our analysis of the data "matches". Somerset County Council has uploaded a significant number of records to the NFI database, although we do not expect the vast majority to be concerns:

Service Uploads	Record Count
Blue Badge Parking Permits	28,645
Creditors History	470,823
Concessionary Travel Passes	109,424
Creditors Standing	10,772
Deferred Pensions	26,032
Personal Budgets	1,564
Pensions	57,446
Payroll	9,902
Private Residential Care Homes	2,108
Total	716,716

3.45 Due to this being a 2-year cycle, we are still reviewing the 2018 outputs and any genuine errors will be reported in due course. We only expect a handful of cases to warrant investigation. For example, the Creditors History data had zero cases requiring investigation. .

3.46 Active participation in the National Fraud Initiative is a key defence for local authorities in combatting fraud, albeit a retrospective exercise. Of the figures quoted in the CIPFA Tracker, the majority of those detected nationwide have come from this exercise.

3.47 In previous cycles, the National Fraud Initiative has only served to confirm the strength of Somerset County Council's systems – particularly around Accounts Payable and VAT. In these areas in particular, the NFI rarely if ever throws up a potential anomaly that was not already detected and reviewed by the respective teams.

3.48 **Transparency requirements**

The Local Government Transparency Code sets out the minimum data that local authorities should be publishing on fraud, the frequency it should be published and how it should be published. The table below sets out the Code's requirements. This was updated on the relevant part of the Council's website by the end of January 2019. The Council also include the January Anti-Fraud audit report and links to SWAP, contact details and to other relevant sites and information, exceeding the statutory requirement.

Minimum to be published	Recommended
Annual publication Publish the following information: <ul style="list-style-type: none">• number of occasions they use powers under the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014, or similar powers• total number (absolute and full time equivalent) of employees undertaking investigations and prosecutions of fraud• total number (absolute and full time equivalent) of professionally accredited counter fraud specialists• total amount spent by the authority on the investigation and prosecution of fraud• total number of fraud cases investigated	Local authorities should publish: <ul style="list-style-type: none">• total number of cases of irregularity investigated• total number of occasions on which<ul style="list-style-type: none">a) fraud andb) irregularity was identified• total monetary value of<ul style="list-style-type: none">a) the fraud andb) the irregularity that was detected, and• total monetary value of<ul style="list-style-type: none">a) the fraud andb) the irregularity that was recovered

3.49 **Anti-Fraud and Corruption Policy**

As part of our annual review of the County Council's anti-fraud and corruption measures, a review has been carried out of our Anti-Fraud and Corruption Policy (**Appendix A**). No substantial change of this document is considered necessary although job titles and posts have been up-dated as relevant. Individual investigations have been carried out by SWAP auditors and Council staff during 2019, demonstrating this the policy is workable in practice.

Fraud remains a clearly stated example of gross misconduct within the relevant HR policies.

3.50 In summary, the Council remains committed to a zero tolerance policy, to investigating all credible allegations, to seeking to recover all losses, and to reporting cases to Action Fraud where there is any possibility of a criminal conviction.

3.51 Significant work was undertaken previously to present to senior managers the risk of fraud, following a number of internal "abuse of position" cases (previously reported to the Audit Committee). It will be necessary to continue to remind officers, members and third parties of Council's policy with regard to fraud.

3.52 Members may recall that the recent procurement of new insurance policies has an improved cover against criminal activity, increasing the potential for any recovery.

3.53 **Anti-Bribery Policy**

This is an Annex to the Anti-Fraud and Corruption Policy. This policy was significantly updated a couple of years ago, with help from SWAP.

3.54 The auditor's overall view was that there was a Low Risk in terms of controls in relation to these offences, and that any response would only need to be proportionate to that level of risk. Officers concur with this assessment. Although some of the controls are not "badged" as anti-bribery, there are many effective controls in preventing bribery, such as the examples in the table below.

Area of Potential Risk	Examples of Mitigating Controls
Award of contracts	Use of Pro Contract and Contract Standing Orders Controlled waiver process Decision paper required and consultation with key officers
Award of planning permission	Decisions made through public Regulation Committee. Members' standards
Recruitment	HR guidelines and support Panel interviewing
Payment of insurance claims	External support, e.g. legal, brokers Review of insurance files from underwriter

3.55 **Anti-Money Laundering Policy**

This policy was similarly extensively updated previously and is an Annex to the Anti-Fraud and Corruption Policy. Again, the risk of money laundering against the Council is deemed Very Low Risk, which is the same conclusion that a number of other local authorities have also reached. Plans to substantially reduce cash handling and transactions, with more electronic payments under our new Cash Handling Policy, and a target to becoming "cashless" by April 2021 will also reduce the risk further. A Cash Handling audit was completed in 2019/20 and reviewed whether cash is collected promptly, efficiently, recorded accurately and held securely. A partial opinion was given due to deficiencies in the new Cash Handling Policy, as well as some control weaknesses in cash handling practices across services. This will be the subject of a follow-up audit in 2020/21 to provide assurance that the recommendations agreed to address these control weaknesses have been implemented.

3.56 The CIPFA Guidance for Local Authorities on Money Laundering makes it clear that Local Authorities are not obliged to comply with the Money Laundering Regulations 2007, but the guidance does recommend that public service organisations should embrace the underlying principles of the money laundering legislation and regulations.

3.57 The role of Money Laundering Reporting Officer (MLRO) is a specifically set out one to support the legislation in the event of any such case arising.

The Money Laundering Reporting Officer (MLRO) is the Funds & Investments Manager. It will be for the MLRO to ensure the appropriate investigate of any Money Laundering allegations and to liaise with the Police.

4. Consultations undertaken

- 4.1** All policies were reviewed in conjunction with the S151 Officer.
- 4.2** All policies were updated previously with significant support from SWAP.

5. Implications

- 5.1** Measures contained within this report will be used to protect SCC from fraud in the forthcoming year.

6. Background papers

- 6.1.** "Fraud and Corruption Tracker Summary Report 2018" CIPFA
"National Fraud Initiative Report 1 April 2016 to 31 March 2018" Cabinet Office
"Code of practice on managing the risk of fraud and corruption" CIPFA
"The local government counter fraud and corruption strategy" Fighting Fraud and Corruption Locally (also Companion and Checklist documents)
"Annual Fraud Indicator 2017 Identifying the cost of fraud to the UK economy"
Experian and others
"United Kingdom Anti-Corruption Strategy 2017-2022" HM Government
"Protecting the English Public Purse 2016" TEICCAF

Note: For sight of individual background papers please contact the report author