



East
Northamptonshire
Council

Governance and Audit Committee – 2 February 2015

Corporate Counter Fraud Strategy

Purpose of report

To present to councillors a draft Corporate Counter Fraud Strategy which addresses the latest best practice and addresses the changes in responsibilities for counter fraud activity as a result of the creation of the Single Fraud Service under the DWP.

Attachment(s)

Appendix A – Draft Corporate Counter Fraud Strategy

1.0 Background

- 1.1 The risks of fraud in local government activity have been highlighted for a number of years by the Audit Commission via their annual “Protecting the Public Purse” reports, and more recently in the Local Government Fraud Strategy, which has been produced by a partnership which includes CIPFA and the LGA. This council has historically focused its counter-fraud activity on council tax and housing benefit activities, as the area of greatest risk of fraud in both volume and cost implications. As a result there has been a specific counter fraud strategy covering these two areas for many years.
- 1.2 Councillors will be aware that other counter fraud activity has also always been undertaken for many other areas of lower fraud risk across the council, such as employment, procurement and payments via procedural arrangements, such as separation of duties, supported by corporate policies such as whistle-blowing. These arrangements have been regularly refreshed as new fraud threats are identified and the adequacy of the organisational response has been regularly reviewed and found generally satisfactory by Internal and External Audit as part of their routine work.
- 1.3 Many of the areas identified as high risk for local government as a whole are less relevant to this council. For example, the council ceased handling cash payments in March 2010 and, since it has a policy of not charging for car-parks, has not had the high risks associated with the cash handling from that activity. Also, as a District Authority we don't have other areas of fraud risk such as direct payments for social care or issuing of disabled parking badges, which is now done via libraries. (The latter is a key area for non-cash fraud.)
- 1.4 Nationally, it is estimated that fraud costs local government over £2 billion per year, and as such it is not a victimless crime as this is money that could otherwise be spent on council services. Because of the preventative effect of counter fraud activity, it is difficult to get a true picture of actual fraud levels. Measurement of the level of fraud detected is only an indicator of counter fraud performance and must be considered alongside other contextual and comparative information.
- 1.5 For example, this council detected 49 cases of Housing Benefit and Council Tax Benefit fraud in 2012/13 compared to an average for Northamptonshire councils of 191. However, the value of the fraud detected by this council in the same time period was £263k compared with the Northamptonshire councils' average of £225k. (Figures from the KPMG Protecting the Public Purse Briefing for ENC 2014). In % terms detected fraud occurred in approx. 0.75% of the Housing Benefit and Council Tax Benefit caseload compared to the highest level in a Northamptonshire council of 3.5%.

2.0 Key Counter Fraud Activity Areas

- 2.1 A number of factors have come together to suggest that now is an appropriate time to review the council's corporate approach to counter fraud activity:
- The creation of the Governance and Audit Committee, which has the remit of looking at the council's corporate arrangements for risk management
 - the transfer of responsibility for Housing Benefit fraud investigation to the DWP (from 1 December 2014)
 - the adoption of a new risk management (ICT) system for recording and managing the risks facing the council at both strategic and operational level
 - the publication of a revised Code of Practice for managing the risk of fraud and corruption by CIPFA.
- 2.2 To assist in this review, Internal Audit were asked to carry out a review of best practice to inform the revised strategy, which now covers all the areas of highest fraud risk for the council. This found many areas of good practice within the council's arrangements but also highlighted areas for improvement. These will be addressed as part of the draft corporate strategy where appropriate and any remaining actions (for example inclusion of references to fraud in the officers Knowledge, Skills and Behaviours framework) will be included in an action plan to be presented to a future committee.
- 2.3 The draft Corporate Counter Fraud Strategy begins by reinforcing the council's zero tolerance approach to fraud and identifying the respective roles of councillors and officers in counter fraud activity. Each area of high fraud risk facing this authority is then considered in turn, highlighting the activities we will undertake to deter and detect fraud in that area together with the sanctions and redress activity expected if fraud is detected. Information on the current or emerging issues or activities in the key areas is highlighted below.
- 2.4 Council Tax, Business Rates and Housing Benefits. As expected from the high priority given to counter fraud activity in these areas in the past, the approach in this area, such as participating in the National Fraud Initiative and having a Fraud Hotline, will continue, albeit the council's focus will be narrowed as a result of the transfer of responsibilities for the investigation of Housing Benefit fraud to the Single Fraud Investigation Service (SFIS) in December 2014.
- 2.5 The following will remain the responsibility of this council;
- The investigation of Local Council Tax Support Scheme fraud
 - The amendment of Housing Benefit claims (subject to fraud)
 - The calculation and recovery of any Housing Benefit overpayments
 - The compilation of information and evidence, requested by DWP from LAs to support an investigation
 - Fraud hotlines/call handling to take reports of fraud/suspected fraud
- 2.6 The latest published figures estimated the loss due to Housing Benefit (HB) fraud and error (F & E) to be 1.45 billion across the UK, an increase of 19% from the previous year. Although the levels of fraud and official error have been fairly stable over the past few years the estimated value of claimant error have increased from £650 million in 2011/12 to £900 million in 2013/14; a 38.5% increase. In response, the government has announced that more money will be made available to local authorities (LA) through a Fraud and Error Reduction Incentive Scheme (FERIS) to increase their efforts to allow SFIS to concentrate on more significant fraud.
- 2.7 The main objectives of FERIS are to:
- encourage LAs to find and correct more incorrect and fraudulent HB claims
 - encourage LAs to get claimants to come forward with their changes
 - reduce the monetary value of F & E in 2014/15, 2015/16 and beyond.

- 2.8 East Northamptonshire will be participating in the FERIS scheme to contribute to these objectives.
- 2.9 *Social Housing Fraud*. It is estimated that 2% of social housing stock outside London is subject to tenancy fraud. As this council does not directly own any stock, we have historically worked with local Registered Providers to enable them to take counter fraud action once a tenancy has been established. Our efforts have been concentrated on ensuring that, when people are about to be offered a social housing tenancy for which we have nomination rights, they are eligible for such accommodation according to our Allocation Policy.
- 2.10 *Procurement and Payments Fraud*. Historically this council has relied on its Financial and Procurement Rules as the key deterrent to this type of fraud, with internal audit and management review as the key detection methods. Both these documents are currently undergoing review to ensure that they continue to be fit for purpose.
- 2.11 *Partnership Fraud* The review of current corporate counter fraud arrangements indicated there has previously been no corporate guidance in relation to partnerships or shared services to consider the effectiveness of the counter fraud arrangements of other parties. The risk of fraud has been considered low previously as such partnerships are with other local authorities who will have similar arrangements and responsibilities to this council. Where services are delivered by private companies, counter fraud activity should be included in the contract or service level agreement.
- 2.12 However, it must be recognised that, in order to meet the challenges of reducing resources, delivering more joined up services and other transformations to service delivery, this council will be working in arrangements which may have very different governance arrangements than previously. It is therefore considered prudent to include some basic guidance within this Strategy and to improve this over time as part of the proposed Action Plan.
- 2.13 *Other Fraud*. The Monitoring Officer, Finance Manager and Internal Audit regularly review Protecting the Public Purse and other information sources for information about emerging area of fraud. If a new area of high fraud risk (volume or cost implication) is identified, they will initiate a review of the relevant arrangements at this council to ensure that the risk of similar frauds is mitigated as far as is reasonable
- 2.14 It was noted in paragraph 1.2 that the council has many other policies and procedures that also contribute to counter fraud arrangements but which are not part of this Strategy. The key policies have been listed in the Strategy for the first time. These include:
- The Whistle Blowing Policy
 - Councillor and officer Codes of Conduct (Parts 5.1 and 5.2 of the Constitution)
 - Officer Knowledge, Skills and Behaviours Framework

Links to these will also be included in the Counter Fraud section of the Intranet (EUNICE) for ease of reference for staff and officers.

3.0 Summary

- 3.1 The proposed Corporate Counter Fraud Strategy provides a framework which brings together in one document a record of this council's counter fraud approaches. As noted above, this draft strategy will be accompanied by an action plan which will be developed once this initial corporate strategy has been adopted. It will also be reviewed annually as part of the review of Corporate Governance

4.0 Equality and Diversity Implications

- 4.1 There are no equality and diversity implications arising from the proposed revised Counter Fraud Strategy.

5.0 Legal Implications

- 5.1 There are no legal implications arising from the proposed revised Counter Fraud Strategy.

6.0 Risk Management

- 6.1 The risk for each area of potential fraud activity highlighted by the Protecting the Public Purse reports at ENC has been considered as part of the preparation of the proposed revised Corporate Counter Fraud Strategy. Where a high risk has been identified, the risk area has been included together with details of the activities that will reduce the risk of that fraud.
- 6.2 The corporate approach taken in the draft Strategy is in line with best practice and thus reduces the overall risk of fraud. However, it should be noted that low levels of detected fraud do not necessarily mean that fraud is not being committed. Fraud will always be attempted and even with the best preventative measures some will succeed.
- 6.3 The arrangements for corporate counter fraud will also be reviewed annually as part of the Council's Annual Governance Statement.

7.0 Financial Implications

- 7.1 The financial implications of this adopting this strategy will be to continue to reduce the cost of fraud to the Council. Because of the difficulty of estimating the impact of preventative measures, the only reliable figures we have for the current level of fraud and overpayments at this council was for that detected on Housing Benefit and Council Tax which was £360,000 in 13/14.

8.0 Constitutional Implications

- 8.1 There are no specific constitutional implications arising from these proposals. However, consideration of the need to review counter fraud responsibilities and roles will be given during the annual review of the Constitution by the Monitoring Officer .

9.0 Corporate Outcomes

- 9.1 The proposed corporate approach to fraud highlighted in the strategy will contribute to the corporate outcome of "Good Value for Money" by preventing losses from fraud.

10.0 Recommendation

- 10.1 The Committee is asked to recommended to adopt the proposed Corporate Counter Fraud Strategy

[Reason: to provide the council with an up-to-date corporate approach to counter fraud activity and thereby reduce the potential impact on the delivery of council services and the wider community of fraudulent activity]

Legal	Power: Various, including Local Government Act 1972, Social Security Fraud Act 1997, Fraud Act 2006, Bribery Act 2012 and The Accounts and Audit (England) Regulations 2011			
	Other considerations: CIPFA Code of Practice on Managing the Risk of Fraud and Corruption			
Background Papers: Previous Council Counter Fraud Strategies and Statements The Local Government Fraud Strategy Protecting the Public Purse 2014 – Fighting Fraud against Local Government				
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February 2015

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NB: Draft versions 0.1 - final published versions 1.0

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Links to other documents

Document	Link

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Foreword

East Northamptonshire Council is determined to maintain its reputation as an authority that will not tolerate fraud and will do its utmost to prevent and detect it. We are committed to protecting the public funds entrusted to us and to upholding the highest standards of financial probity and accountability.

We also recognise the risk of corruption or abuse of position for personal gain by councillors or officers, and our policies and procedures are intended to ensure that this cannot occur in any area of council activity.

The cost of fraud to local government has been estimated at £2.2 billion a year across the UK (Fighting Fraud Locally 2012). This is money that should be used for local services and we have adopted a zero tolerance approach to any such attempts to divert much-needed resources from our communities.

This strategy clearly demonstrates that we will take all necessary steps to prevent and detect fraud and corruption. Where it does occur, we will robustly pursue those responsible and recover losses, referring matters to the police where appropriate.

Councillors and officers will play a key role in providing a corporate framework within which counter-fraud arrangements will flourish, and promoting an anti-fraud culture across the whole of the council. This should provide a sound defence against potential abuse of public funds

We also expect that individuals and organisations (e.g. suppliers, contractors, service providers and the voluntary sector) that we deal with will act with integrity and without thought or actions involving fraud and corruption. Where relevant, we will include appropriate clauses in our contracts about the consequences of fraud, bribery and corruption; evidence of such acts is most likely to lead to a termination of the particular contract and may lead to prosecution.

We urge all of our employees, contractors and partners to assist us in fighting fraud by:

- familiarising themselves with this strategy and being aware of the risk of fraud
- leading by example in ensuring adherence to legal requirements, standing orders, financial regulations, codes of conduct, procedures and practices.

Cllr Steven North
Leader

Cllr Colin Wright
Chair of Governance and Audit Committee

David Oliver
Chief Executive

1.0 Introduction

- 1.1 The purpose of this strategy is to set out this council's approach to countering fraud and minimising the risk of corruption across the range of services we offer. It is based on a series of comprehensive and inter-related procedures designed to deter, frustrate, or take effective action against any attempted fraudulent or corrupt acts affecting the council.
- 1.2 The strategy sets out:
- What we expect from our staff and what their roles are
 - How we will deter and detect fraud and corruption
 - How we will conduct investigations and what action we will take when fraud is discovered
 - How we will protect the data we hold
 - How we will communicate with the public
 - How people can raise concerns
- 1.3 Constant vigilance is required to guard against the risk of either internal or external abuse of public funds. Therefore, it is our intention to create an environment within which fraud and corruption are clearly unacceptable and where councillors, staff and public alike feel at ease to report any suspicions they have.
- 1.4 The council, including councillors and senior officers, will deal swiftly and firmly with those who defraud the council.
- 1.5 This strategy provides both general guidance on how the council will continue to deliver its counter-fraud activities and, via the appendices, details how the council will deal with fraud in particular higher fraud risk areas of service delivery.

2.0 Scope

- 2.1 This strategy applies to councillors, non-elected and co-opted members of committees, and all officers (full time, part time, temporary and casual) who work for the council. It is also intended to apply to the staff of contractors and other organisations who deliver services on behalf of the council. Finally, it applies to the users of our services.
- 2.2 For the purpose of this strategy:
- **Fraud** is defined as the deliberate misrepresentation of circumstances, or the deliberate failure to notify changes of circumstances with the intent of gaining some advantage. This can include fraud by false representation, failure to disclose information or abuse of position.
 - **Corruption** is offering, giving, soliciting or accepting an inducement or reward, which may influence the action of any person.
- 2.3 Although this strategy specifically refers to fraud and corruption, it equally applies to all financial malpractice. This includes a wide range of irregularities and criminal acts that are financial or finance-related. It includes, for example, the criminal acts of theft of property, which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and crime.
- 2.4 It also includes bribery and corruption. Officers and councillors can be exposed to a number of "pressures", from contractors, landlords, the public and others, to act in a

particular way in a particular case. This may involve "favouritism" regarding the access to all kinds of services and benefits (e.g. grants, awards, benefits, council housing, or gaining contracts, planning permission).

- 2.5 This document is intended to set out the action that should be taken in relation to suspected instances of theft, fraud or corruption involving council funds and assets and funds the council administers on behalf of others or for which we are the accountable body. It does not include theft that occurs as a result of a burglary or robbery. These should be reported immediately to the Police and the Finance Manager.
- 2.6 This document is intended to be used in conjunction with the following documents and activities which form a holistic anti-fraud and corruption framework:
- Confidential Reporting code i.e. Whistleblowing Policy
 - Councillor and officer Codes of Conduct (Constitution)
 - Complaints policy
 - Procedures for financial and procurement matters; (Constitution)
 - Sound internal control systems, procedures and reliable records;
 - Effective internal audit arrangements;
 - Officer Knowledge, Skills and Behaviours (KSBs) framework
 - Staff Management Policy, including Induction and Training
- (All documents noted above can be found on either the council's website or EUNICE, the council's intranet.)
- 2.7 The actions and responsibilities outlined within this strategy aim to help the council to ensure that the culture and tone of the organisation continues to be one of honesty and opposition to fraud and corruption.

3.0 The role of councillors, officers, partners and the public

3.1 Councillors

- 3.1.1 Responsibility for an anti-fraud culture is the joint duty of all councillors involved in giving political direction, determining policy or directing the council's resources. This strategy covers all aspects of fraud and corruption, whether it is attempted against the council from outside or from within its own workforce
- 3.1.2 Councillors are required to operate within the statutory framework, the approved Constitution and the local codes of conduct. The latter include:
- Part 5.1 Councillors' Code of Conduct
 - Part 5.3 Protocol on Councillor and Officer Relations
 - Part 5.4 Code of Practice for Planning Procedures
 - Part 5.5 Protocol for Planning Application Site visits
 - Part 5.6 Protocol for Councillors on Confidentiality
 - Part 5.7 Code of Practice for Licensing Procedures
- These and other relevant guidance are specifically brought to the attention of councillors at Induction training after their election, and via subsequent regular targeted refresher and update training.

- 3.1.3 The council also has in place three committees whose monitoring roles are relevant:
- The Governance and Audit Committee, which sets and monitors standards of conduct and is responsible for the council's policies in relation to Counter Fraud and Corruption. The committee also considers Internal and External Audit reports as well as considering the arrangements for managing and controlling the risks the council faces.
 - The Policy and Resources Committee, including Finance and Personnel Sub-committees, that manages the way in which the council's financial and other resources are controlled;
 - The Scrutiny Committee, which can consider emerging financial risks and significant budget variations.
- 3.1.4 The council has delegated to the Monitoring Officer matters relating to an officer's or councillor's conduct, investigation of breaches of the Codes of Conduct or local protocols, gifts and hospitality, interests, and general concerns about ethical standards.

3.2 Officers

- 3.2.1 It is the responsibility of managers, councillors and officers to create and maintain a culture underpinned by the seven principles of public life defined by the Nolan Committee. These are Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, and Leadership. The behaviours associated with these principles are explored further in the council's Knowledge, Skills and Behaviours Framework.
- 3.2.2 All officers' terms and conditions of employment demand the highest standards of conduct. All officers must abide by the council's Code of Conduct for Officers, which sets out the council's requirement on personal conduct. This Code forms part of the Constitution and is embedded into the terms and conditions of employment. Officers are also expected to follow any code of conduct or ethical framework adopted by their personal professional bodies or trade organisations
- 3.2.3 The council operates within Section 117 of the Local Government Act 1972, regarding the disclosure of interests in contracts relating to the council or the non-acceptance of any fees or rewards whatsoever other than by their proper remuneration. These requirements are set out in the council's Code of Conduct for Officers, and the Procurement Rules. Officers must be aware that it is a serious criminal offence for them to receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in their official capacity. If an allegation of corruption is made it is for the officer to demonstrate that any such rewards have not been corruptly obtained.
- 3.2.4 Managers are encouraged to conduct regular self-assessments of the systems and procedures for which they are responsible and to regularly test high risk systems, for example income collection and banking procedures.
- 3.2.5 The first people to know of a risk will usually be those who work for the organisation. The council actively encourages openness and expects any individual to report concerns or suspicions of fraud or corruption to their line manager without delay. Officers who feel unable to report to their line management should contact the Head of Internal Audit directly. Should there be a preference to make an anonymous notification then the Whistleblowing Policy should be used.
- 3.2.6 The council will not accept intentional misuse of the reporting and investigative process. It is the council's policy to deal with any intentional abuse of the policy, such as raising malicious allegations, as a disciplinary matter.

- 3.2.7 The Chief Finance Officer has a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure that proper arrangements are made for the council's financial affairs. In addition, under the Accounts & Audit Regulations 1996, as the "responsible financial officer", the Chief Finance Officer is required to determine the accounting control systems, which include:
- measures to enable the prevention and detection of inaccuracies and fraud,
 - identification of the duties of officers dealing with financial transactions and the division of responsibilities of those officers in relation to significant transactions.
- The latter requirement is a key control in the prevention of impropriety.
- 3.2.8 This strategy helps towards discharging part of this responsibility. Accordingly, the Chief Finance Officer will:-
- take overall responsibility for the maintenance and operation of this Policy
 - maintain records of financial malpractice, including concerns and allegations received; matters arising from audits; investigations and evidence; and the outcomes
 - report as necessary to the council.
- 3.2.9 The council's Monitoring Officer has overall responsibility for the maintenance and operation of the Whistleblowing policy, the Register of Officers' Interests and the Register of Gifts and Hospitality. (Any matters relating to these on the part of the Monitoring Officer will be reviewed by the Head of Paid Service).
- 3.2.10 The Head of the Paid Service, Chief Finance Officer and Monitoring Officer will meet regularly to consider and recommend action in connection with fraud and corruption, corporate governance and other probity matters. It is the responsibility of the Chief Executive and the Corporate Management Team to assist in the prevention and detection of fraud and corruption.

3.3 Partners

- 3.3.1 The council has appointed Welland Internal Audit to carry out Internal Audit responsibilities for this council. This includes a duty to monitor instances of financial irregularities within the council as a whole, and to report certain details to external bodies, such as External Audit. The annual programme of internal audit work includes reviews of areas at risk of fraud. Any irregularity identified by Internal Audit as part of its normal review function will be reported and investigated in accordance with the Fraud Response Plan. Internal Audit also has a duty to ensure that appropriate investigations are carried out. For this reason, immediate notification of a suspected financial irregularity to Internal Audit is essential.
- 3.3.2 Part of the External Auditor's statutory duties are to ensure that the council has in place adequate arrangements for the prevention and detection of fraud and corruption
- 3.3.3 With the rapid increase in recent years of frauds perpetrated against a variety of local authorities and benefits agencies, which usually involve fraudsters having multiple identities and addresses, the necessity for liaison with other organisations has become paramount. These organisations may include, for example:
- Other local authorities including our Northamptonshire and Welland partners
 - Registered Providers (of social housing)
 - Department for Work and Pensions (DWP)
 - HMRC

- 3.3.4 The council is committed to exchanging information with other local authorities, together with local and national agencies, in order to identify and prevent fraud using data matching techniques. Such activity is carried out in full compliance with the Data Protection Act, Human Rights Act and Codes of Practice for Data Matching Exercises. These exercises include providing payroll information to other agencies for data matching purposes.
- 3.3.5 There is a high degree of external scrutiny of the council's affairs by a variety of bodies including the appointed External Auditors, and HM Customs and Excise. Although the primary purpose of this scrutiny is not to detect fraud or corruption, the knowledge that regular inspections take place should act as a deterrent.
- 3.3.6 The council also promotes its Whistleblowing policy externally to encourage and enable contractors, suppliers and the public to raise any serious concerns.

3.4 Public participation

- 3.4.1 The public has an important role to play in supporting this strategy. Through the use of all types of public media, we will focus public attention on fraud issues. Public perception is changing and attitudes are moving away from viewing fraud as a victimless crime. We will strive to create a culture, which encourages honesty and is intolerant towards fraud, deeming it socially unacceptable.
- 3.4.2 For this strategy to be effective, wide support and co-operation is essential. The council's Whistleblowing policy sets out procedures for reporting any allegation of impropriety and creates an open environment, encouraging anyone to report any suspicions should they arise.
- 3.4.3 Our 24-hour telephone hot line (01832 742017) has already provided helpful leads on benefit frauds. This permits members of the public to record their suspicions confidentially on a 24-hour basis. We will continue to advertise this facility's availability for the public to use to advise us confidentially of all types of fraud. Referrals can also be made via the council's website.
- 3.4.5 From time to time, we will publicise the success of counter fraud activities and bring successful prosecutions to public notice

4.0 Deterrence

- 4.1 The publication of this Anti-Fraud and Corruption Policy, and regular reinforcement of the message that the council operates a zero tolerance approach, will help deter those considering perpetrating fraudulent acts.
- 4.2 A key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential officers, in terms of their propriety and integrity. In this regard, temporary staff should be treated in the same manner as permanent officers. Officer recruitment should be in accordance with procedures specified in the Constitution or agreed by the Personal Sub-Committee or Head of Resources & Organisational Development. Whenever possible, written references should be obtained with specific assurances regarding the known honesty and integrity of potential officers before formal employment offers are made. This is essential in the high risk areas such as benefits and council tax, and for any officer operating key internal controls within financial and procurement procedures.

- 4.3 Staff will be fully trained in the work they undertake. The council will provide appropriate induction training and follow-up training together with suitable technical or professional training. In particular, all officers, (full time, part time, casual or agency staff) involved in operating internal control systems, financial or procurement procedures and financial or finance-related systems will receive training appropriate to these areas. Fraud awareness training will be provided to managers and staff with financial administration responsibilities on a regular basis. All managers will be required to release staff for this purpose.
- 4.4 There are a number of ways to deter potential fraudsters from committing or attempting fraudulent or corrupt acts, whether they are inside or outside of the council, and the council will proactively apply these. They include:-
- Public participation via a range of local media
 - Publicising the council's strategy and state this at every appropriate opportunity, e.g. clause in contracts, publications, public reports and in media coverage
 - Acting robustly and decisively when fraud and corruption are suspected and proven, e.g., the termination of contracts, dismissal, and prosecution
 - Taking action to effect the maximum recoveries for the council e.g. through agreement, Court action, penalties, sanctions and insurance
 - Having sound internal control systems that still allow for innovation but at the same time do not provide the opportunity for fraud and corruption
 - To provide effective and efficient investigations resources
 - The operation and advertising of a fraud hotline via the Housing Benefits section
 - To provide effective and secure ICT systems.
- 4.5 For this strategy to be effective, council-wide support and co-operation is essential. The council's Whistleblowing Policy sets out procedures for reporting any allegation of impropriety and creates an open environment, encouraging officers to report any suspicions should they arise. The code also offers protection to an officer disclosing such information.
- 4.6 The council is a member of the National Anti Fraud Network and receives regular intelligence bulletins about the latest fraud threats, which are disseminated to the relevant departments and officers.

5.0 Detection and investigation

- 5.1 The array of preventative systems, particularly internal control systems within the council, help to provide indicators of, and to detect, any fraudulent activity. However, despite the best efforts of managers and auditors, many frauds are discovered by chance, or 'tip-off', and the council promotes the Whistleblowing policy to encourage and enable these to be reported. Contractors and other partners, together with the public, are also encouraged to report any concerns which they may have through the external Whistleblowing process or by using the council's formal complaints procedures. The Policy Statement provides a clear path for raising concerns and facilitating tip-offs, and the fraud response arrangements outlined in this strategy enable such information or allegations to be properly dealt with. The council's Whistleblowing Policy also gives advice on how to raise a concern and what safeguards and support are available to those who raise concerns.
- 5.2 In addition, staff will develop a proactive programme of work in high-risk areas, such as Housing Benefits. Internal Audit and External Audit will liaise closely and implement a cyclical programme of audits, which will test for fraud and corruption.

- 5.3 Reporting suspected irregularities is essential to the Counter Fraud and Corruption Strategy and ensures:-
- consistent treatment of information regarding fraud and corruption;
 - proper investigation by an independent and experienced Internal Audit team;
 - the proper implementation of a fraud response investigation plan; and
 - optimum protection of the council's interests.
- 5.4 When a potential fraud is reported, an investigating officer will be appointed by the Chief Executive, Chief Finance Officer or Monitoring Officer who will :-
- deal promptly with the matter;
 - record all evidence that has been received;
 - ensure that evidence is sound and adequately supported;
 - make secure all of the evidence that has been collected;
 - where appropriate, contact other agencies, e.g. Police;
 - when appropriate, arrange for the notification of the council's insurers; and
 - report to senior management and, where appropriate, recommend that management takes disciplinary action in accordance with the council's disciplinary procedures.
- The investigating officer will usually be a member of the Corporate Management Team or Internal Audit, but exceptionally external investigators may also be appointed, particularly if specialist knowledge is required.
- 5.5 The Chief Finance Officer, Monitoring Officer, Finance Manager or (investigating officer appointed as above) and Internal Audit staff (including private contractors and consortium staff contracted to provide Internal Audit work) have authority to:
- Enter at any time council premises or land, subject to any statutory or contractual restrictions that may apply
 - Have access to all records, documents and correspondence relating to any financial or other business of the council and to remove any such records as is necessary for the purpose of any investigation in fraud
 - Require and receive such explanations as are necessary, concerning any matter under examination
 - Require employees of the council to produce cash, stores or any other council property under their control.
- 5.6 Where financial impropriety is discovered, the council's presumption is that the Police will be called in where amounts are considered material by the Chief Finance Officer. Referral to the Police is a matter for the Chief Finance Officer in consultation with the other statutory officers. Various officers will be consulted during investigations and the Chief Executive will be kept informed of referrals to the Police. Referral to the Police will not inhibit action under the disciplinary procedure.

6.0 Sanctions

- 6.1 After an investigation, sanctions will be applied where fraud and corruption are proven to be present. This will be done in a comprehensive, consistent and proportionate manner whereby all possible sanctions - disciplinary, civil and criminal - are considered. The council will work with any appropriate bodies and processes to punish wrongdoing. The level of sanction pursued will be considered at the end of the investigative process when all evidence is available. The council has set out a specific approach for benefit fraud at Appendix 8,
- 6.2 For councillors, action could include the sanctions available for any breaches of their Code of Conduct.
- 6.3 The council's disciplinary procedures will be used against officers where the outcome of the audit investigation indicates improper behaviour. Any resulting disciplinary hearing will be conducted in accordance with the disciplinary procedures. The outcome of a disciplinary process may include a range of levels of warning or, where gross misconduct is found, dismissal of the individual concerned. All records of such disciplinary action will be maintained in accordance with the Staff Management Policy. It should be noted that "reasonable belief" is sufficient ground for dismissal, rather than absolute proof as in a court of law.
- 6.4 Any employee found to be perpetrating fraud on another local or national agency is liable to face disciplinary action where this has implications for the council's trust and confidence in the employee and raises concern about his/her conduct.
- 6.5 In order to deter any persons from attempting to defraud the council, appropriate action will be taken to publicise the general outcomes of disciplinary action and to remind employees of the control measures that are in place.
- 6.6 When fraud or impropriety has been perpetrated by organisations or individuals with whom the council has a contractual relationship, the council will take robust action including, where appropriate, the termination of the contract, publication of findings and civil recovery proceedings.
- 6.7 Where any loss is incurred to fraud and corruption the council will take action to effect maximum recovery of that loss.

7.0 Redress and subsequent action

- 7.1 The manager responsible for the service in which a loss has occurred as a result of fraud or other misconduct must ensure that all possible means to recover losses are pursued and that effective co-operation takes place between interested parties.
- 7.2 When an employee resigns before a disciplinary hearing takes place, it is anticipated that the disciplinary process will usually continue. The manager of the service concerned must consult the statutory officers and Human Resources Manager to ensure that the most appropriate action is taken to secure the repayment of all losses incurred by the council wherever possible.

- 7.3 When a case has been referred to the Police and a criminal prosecution takes place the investigating police officer will be asked to submit a request that an order for compensation is made by the court, unless otherwise decided. When neither a voluntary agreement nor a compensation order is made the manager will consult the Monitoring Officer about other legal action that can be taken to recover the council's losses. This may include making application for recovery from an employee's pension fund.
- 7.4 Where an investigation identifies an incident of fraudulent behaviour the Internal Audit team will review the internal controls and report on the weaknesses in the system that had allowed this fraud to occur. This will be reported to the relevant manager and it will be the manager's responsibility to promptly and robustly implement agreed actions to resolve this.
- 7.5 The council's External Auditor will be informed by the Head of Internal Audit of all major incidents of fraud or financial impropriety and on occasion it may also be necessary to inform other organisations such as HM Revenues and Customs and the Department of Work and Pensions.
- 7.6 The Chief Finance Officer and Head of Internal Audit will regularly report the details of investigations of fraud, financial irregularity and other misconduct to the Chief Executive and the Monitoring Officer for them to consider what further preventative action is appropriate.
- 7.7 The annual report of Internal Audit activity that is considered by the Governance and Audit Committee includes a summary of investigations that have occurred and the action that is required to prevent similar problems recurring. A summary report will also be presented to Corporate Management Team.

8.0 Data Protection

- 8.1 At all times the rights and responsibilities laid down in legislation pertaining to the rights of the individual and data protection will be observed and all councillors and officers are bound by this requirement.
- 8.2 In the course of both its counter fraud activity and normal service delivery that council will hold and process sensitive data. Any unauthorised access could result in inability to satisfactorily conclude an investigation. Such data should be held securely, and where possible in digital form that is copied regularly for security. Access should be restricted at all times. All data and systems should be managed in line with the council's ICT policies.
- 8.3 The council recognises the need, from time to time, to carry out covert surveillance for the prevention or detection of crime or other specific purposes. The council will only use surveillance where it judges such use to be proportionate to the seriousness of the matter being investigated. Appropriate authorisation procedures will be operated.

9.0 Outcomes

- 9.1 This corporate counter fraud strategy contributes towards four of the council's corporate outcomes:
- Good quality of life – through a secure benefit system
 - Good value for money – through improved recovery of overpaid benefit
 - High quality service delivery – through conducting timely investigations
 - Effective partnership working – through closer working with outside agencies

10.0 Next steps

- 10.1 The council will maintain a continuous overview of these arrangements and the roles of the Monitoring Officer and Chief Finance Officer, including regular reviews, usually on an annual basis, of the Constitution, Financial Procedures, various codes of practice, accounting instructions and audit arrangements. The arrangements for corporate counter-fraud will also be considered as part of the council's Annual Governance Statement.
- 10.2 The outcome of this continuous review will be an action plan. An initial action plan, which reflects the remaining recommendations of the 2015 Internal Audit Review of Counter Fraud arrangements, can be found at Appendix 14. In future years any further actions will be included in the Annual Governance Statement Action Plan.

Council Tax Support Fraud

1.0	Context
1.1	<p>Council Tax Support is a locally defined Council Tax Reduction Scheme. Council tax support fraud can occur where a person makes a false application by failing to declare information or by providing false information in their application or failing to report a change in their circumstance.</p> <p>Please also refer to Appendix 10 Code of Conduct for Benefit and Revenues Officers.</p>
2.0	Deterrence
2.1	The council has instituted a number of processes and deterrence measures to safeguard the benefit system including the following:
2.1.1	<p><i>Royal Mail do-not-redirect</i> This Royal Mail facility ensures claimants do not move address and continue to receive Council Tax Support in respect of their former address. Undelivered letters are returned to our offices.</p>
2.1.2	<p><i>Data matching</i> Data matching exercises under the Housing Benefit Matching Service has been successful in bringing to light overpayments of benefit. We will continue to collaborate in these exercises. Please also refer to Appendix 10 – Data Matching Policy.</p>
2.1.3	<p><i>Customer information system</i> A Customer Information System terminal (CIS) provides us with limited access to DWP records. This facility speeds enquiries considerably and provides up to date information</p>
2.1.4	<p><i>Electronic transfer of data</i> Electronic transfer of data, this facility is linked with CIS and ensures data from the DWP is delivered accurately and quickly to us.</p>
2.1.5	<p><i>Service level agreements</i> Service level agreements are maintained with the Department for Works and Pensions, Pension Service, Job Centre Plus, Rent Officer Service and DWP Debt Management. These are designed to improve performance standards and set targets that are monitored on a regular basis.</p>
2.1.6	<p><i>Landlord Register</i> Details are held electronically. Periodical checks, run against this list, help to validate claims.</p>
2.1.7	<p><i>Fraud Hotline</i> This permits members of the public to record their suspicions confidentially on a 24 hour basis. Members of the public can also make referrals via the council's website.</p>

2.1.8	<p><i>Sanctions/Prosecutions Policy</i></p> <p>Where suspected cases of fraud have been investigated, and sufficient evidence has been obtained to sustain a prosecution, the council will seek to impose one of the following sanctions:</p> <ul style="list-style-type: none"> • A local authority caution • An administrative penalty • A prosecution.
2.1.9	<p><i>Quality Control/Internal Audit</i></p> <p>Daily 10% checks on assessments carried out in the benefit service help maintain accuracy and help identify training needs. They also provide a countermeasure against internal fraud. In addition, Internal Audit carries out cross checks against pay-roll data and other sources as an internal data-matching exercise.</p>
2.1.10	<p><i>Investigations</i></p> <p>Fraud files are kept in locked cabinets. Suitable accommodation is available for conducting interviews under caution, and for the delivery of cautions and administrative penalties.</p>
2.1.11	<p><i>Surveillance</i></p> <p>From time to time some investigations may require covert surveillance; in such cases Human Rights and Data Protection issues come to the fore. All surveillance work will be carried out in accordance with our corporate policy, Home Office code of practice and the Regulation of Investigatory Powers Act 2000 (as amended). Our officers are trained to abide by these rules.</p>
3.0	Detection
3.1	<p>This council is committed to maintaining the highest standards of probity. It expects the very highest ethical standards from its Officers and Councillors in order to protect its good name with the public. It would be unacceptable to ignore potential fraud and procedures are in place whereby staff can raise concerns in confidence without fear of reprisal.</p>
3.2	<p>Procedures and work instructions outline the process to be followed where a fraud is suspected involving claimants and landlords. Officers are trained in these as part of their induction process</p>
3.3	<p>Although there are various means of detecting fraud one of the most useful sources of information comes from local knowledge and receiving information from the public.</p>
3.4	<p>We can legally request information from:</p> <ul style="list-style-type: none"> • Employers • Pension providers • Utility companies • Financial institutions (such as banks and credit card companies) • Telecommunication providers • Many other sources
3.5	<p>Other tools used in investigations to obtain information are:</p> <ul style="list-style-type: none"> • Partnership working with other council departments • Partnership working with the Department for Work and Pensions • Surveillance.

3.6	Where we suspect a third part is involved, we will also investigate the third party, eg landlord, employer.
4.0	Sanctions/Prosecutions Policy
4.1	Where suspected cases of fraud have been investigated, and sufficient evidence has been obtained to sustain a prosecution, the council will seek to impose one of the following sanctions: <ul style="list-style-type: none"> • A local authority caution • An administrative penalty • A prosecution.
4.2	The council operates a comprehensive sanction policy which sets out the council's policy towards prosecution and the other sanctions available for benefit fraud offences. The policy also serves as an operational guide to ensure a consistent and fair approach to the application of sanctions. This is set out in Appendix 8.
5.0	Redress
5.1	Overpayments of Council Tax Support are transferred to the claimants council tax account and recovered via Council Tax recovery procedures. This will include court action if necessary.
6.0	Subsequent action
6.1	Files in relation to council tax support fraud will be retained by the council for a maximum of seven years if fraud is accepted or proven., Otherwise, they are destroyed after 14 months in accordance with DWP guidance.
6.2	Notification that an indicator on the Academy ICT system that council tax support fraud has taken place on a specific account that is visible when the account is accessed will stay in place for 14 months for cases where fraud is not proven and 7 years for cases where fraud is proven.

Other Council Tax Fraud

1.0	Context
1.1	Council tax 'single occupier discount' of 25% is available to people who live alone.
1.2	Additionally, some residents are 'disregarded' i.e. not counted when calculating how many people are resident in a property. This can result in a 25% discount if all but one of the residents is disregarded or a 50% discount if all the residents are disregarded.
1.3	Some properties with certain defined facilities for a disabled resident can get a discount equal to a reduction of one 'band' on the council tax charging scale.
1.4	Some properties are completely exempt from council tax if they fulfil certain defined criteria, such as a property occupied only by full time students.
1.5	A property which is classified as an annexe, and occupied by a relative, would qualify for a 50% reduction.
1.6	Council tax fraud can occur where a person fails to declare information or by providing false information in their application or failing to report a change in their circumstance.
2.0	Deterrence
2.1	Various safeguards have been put in place to ensure council tax discounts and exemptions are only claimed and awarded where it is appropriate to do so. Many of these are a legacy from the DoE practice notes that were issued when council tax was implemented in 1992/93.
2.2	Deterrence measures include: <ul style="list-style-type: none"> • Requirement for evidence to be provided at application stage • Declaration of accuracy at application stage • Statement of potential penalty at application stage • Annual postal rolling review for single occupier discount. • Targeted data-matching exercises, facilitated by external provider, for single occupier discount • Annual postal review for 'disregard' discount
3.0	Detection
3.1	Quality management procedures and detailed work instructions are in place to ensure that any potential fraud is recorded and dealt with promptly. Detection measures include: <ul style="list-style-type: none"> • Annual postal rolling review for single occupier discount. • Targeted data-matching exercises, facilitated by external provider, for single occupier discount • Annual postal review for 'disregard' discount.

4.0	Sanctions
4.1	Imposition of a £70 penalty which can be recovered using the council tax administration and enforcement process.
5.0	Redress
5.1	Cancellation of the discount or exemption and collection of the full amount due, using council tax administration and enforcement process.
6.0	Subsequent action
6.1	The notepad of the relevant account will be updated to include a record of the incident.
6.2	Work procedures and instructions will be amended where necessary to avoid recurrences.

NNDR Fraud – Discretionary Rate Relief

1.0	Context
1.1	Discretionary Rate relief is available to a variety of organisations. It can be granted in its own right or as a supplement to Mandatory Rate Relief. The council outlines it's scheme for charities, institutions, clubs, rural businesses and retail premises in a separate policy (http://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?fileID=3195&categoryID=55). That policy that has been written in such a way as to allow ratepayers to identify how they can maximise their rate relief and see that relief has been granted in a fair and transparent manner.
1.2	In summary, mandatory relief is granted to institutions, organisations or trusts established for charitable purposes in respect of property used wholly or mainly for charitable purposes. Mandatory relief is 80% of the rates chargeable.
1.3	Discretionary relief can also be given to charitable bodies in addition to mandatory relief. Thus, up to 100% relief can be achieved. Non-profit making bodies (ineligible for mandatory relief) can be granted up to 100% discretionary relief of rates.
1.4	From 1/4/2012 authorities can grant local discounts entirely as they see fit within the limits of primary legislation and European rules on state aid. Clause 69 of the Localism Act 2011 amends section 47 of the Local Government Finance Act 1988 to supplement the limited circumstances in which Local Authorities can grant relief. The Government can extend the limits of Section 47 relief and fund, using a grant, under section 31 of the Local Finance Act 2003
1.5	From 1/4/2013, where the billing authority grants discretionary rate relief, the cost of relief will be split through the local and central share under the Non Domestic Rating (Rate Retention) Regulations 2013
1.6	<i>The maximum amount that the council will contribute in any financial year to an individual ratepayer is £10,000.</i> This limit allows the council to make more accurate budgetary provision for Discretionary Rate Relief whilst maintaining equality and continuing to support local businesses. This limit will be reviewed periodically
2.0	Deterrence
2.1	The council is committed to reducing fraud in all its forms. An organisation which tries to fraudulently apply for Discretionary Rate Relief by falsely declaring their circumstances or providing a false statement or evidence in support of their application, may have committed an offence under the Theft Act 1968. Where we suspect that such a fraud may have occurred, the matter will be investigated and this may lead to criminal proceedings being instigated.
2.2	We will communicate with other grant funders to prevent duplication of payment in respect of Business Rates

2.3	We will safeguard the interests of local council tax payers by ensuring funds allocated for the award of discretionary relief are used in the most effective, efficient and economical way.
3.0	Detection
3.1	All applicants are required to complete an application form. Such information and evidence as the council requires must be provided to support an application and in the event that the requested information and evidence is not provided the application may be refused.
3.2	In submitting an application the ratepayer must demonstrate with supporting evidence that the award of any relief will enable the people of East Northamptonshire to benefit from a stronger economy.
3.3	On receipt council officers will prepare a report setting out the merits of the application. This report will detail, amongst other elements the economic, social and environmental benefits that may derive from granting the application.
3.4	Any awards of relief will usually be allowed for five years for Charitable and Non Profit Making Organisations and 12 months for applicants under section 69 of Localism Act 2011. At the end of this period a new application must be submitted.
3.5	The council reserves the right to review the award should the circumstances of the organisation change during the period of the award.
4.0	Sanctions
4.1	Should an applicant in receipt of discretionary rate relief be found guilty of unlawful activities for whatever reason, entitlement will be forfeited from the date of conviction.
5.0	Redress
5.1	If an application is found to be false, the council will use all available means to recover all monies paid, including recovery of all overpayments of Discretionary Rate Relief through the organisation's Business Rates accounts system and court action where appropriate
6.0	Subsequent action
6.1	Application forms in relation to Mandatory and Discretionary Relief will be retained by the council for seven years

NNDR – Other Discounts and Exemptions

1.0	Context
1.1	Non Domestic 'small business rate relief is available to businesses occupying one business in England with rateable values under 12000.
1.2	Empty property exemptions are applied to specific types of properties and where rateable values are under 2600. A retail premises can achieve 3 months exemption when the property becomes unoccupied and industrial premises can achieve 6 months exemption to empty property rates.
1.3	Unoccupied new builds up to October 2016 will be exempt from unoccupied rates for up to 18 months.
1.4	The Local authority has discretion to award relief for a partly occupied property. Unoccupied relief can be applied for a three or six month period on the empty part and a certificate apportioning the rateable value is obtained from the valuation officer.
1.5	Non Domestic fraud can occur where a person fails to declare information or by providing false information in their application for an exemption or discount or failing to report a change in their circumstance.
2.0	Deterrence
2.1	Various safeguards have been put in place to ensure non domestic discounts and exemptions are only claimed and awarded where it is appropriate to do so in line with statutory legislation.
2.2	Deterrence measures include the requirement for evidence to be provided at application stage including photographs of empty areas.
3.0	Detection
3.1	Quality management procedures and detailed work instructions are in place to ensure that any potential fraud is recorded and dealt with promptly. Detection measures include: <ul style="list-style-type: none"> • Inspection of premises where photographs cannot be provided to identify areas of occupation or empty areas. • Local knowledge can identify questionable information.
4.0	Sanctions
4.1	Removal of any reliefs applied and recovery using the Non Domestic Collection and Enforcement process

5.0	Redress
5.1	Cancellation of the discount or exemption and collection of the full amount due, using Non Domestic Administration and Enforcement process.
6.0	Subsequent Action
6.1	The notepad of the relevant account will be updated to include a record of the incident.
6.2	Work procedures and instructions will be amended where necessary to avoid recurrences.

Housing Fraud

1.0	Context
1.0	Housing Fraud can occur where a person makes a false application by failing to declare information, providing false information or failing to report a change of circumstance that may affect their Housing Register or Homelessness applications.
2.0	Deterrence
2.1	Every housing register applicant must complete a registration form providing accurate information on their housing circumstances. Homes Direct are the council's housing contractor operating the Housing Register and processing Homelessness applications on the council's behalf, including carrying out checks on information provided. Before being offered a property applicants will be asked to provide proof to support their application. Examples of this will include proof of income, benefits, access rights to children and levels of capital.
2.2	All Housing Register applicants are requested to acknowledge a declaration on the Housing Register application that they understand that giving false information is fraud and will mean that they do not get a home, could lose any home they have, and will be excluded from accessing future housing. They are also advised that by submitting their information, they are giving permission to share their information with other housing providers and agencies for the prevention of social housing fraud.
2.3	<p>Before an individual makes a Homelessness Application under Part VII of the Housing Act 1996, amended by the Homelessness Act 2002, the interviewing officer reads out the statement stating that:</p> <p>Housing Act 1996- section 214, 'It is a criminal offence for anyone applying to a local authority for accommodation to knowingly or recklessly make a false statement, withhold information that is reasonably required or to fail to tell us about a change in your circumstances.'</p> <p>'If you commit an offence under this section, you may be prosecuted by the council and if found guilty, ordered to pay a fee of up to £5000. If you do not understand this, ask me to explain.'</p> <p>Applicants are then required to sign a declaration stating they have read and understood the implications of the above statement.</p>
3.0	Detection
3.1	Homes Direct will make any enquiries as they deem necessary in order to assess a housing application. Checks on all details that have been entered at the registration stage will be made before making an offer of accommodation. This is to determine the applicant is still eligible to receive a nomination and has updated their circumstances if appropriate after application. This may involve contacting previous landlords etc.

3.2	It is the applicant's responsibility to update their Housing Register application as changes in circumstances may affect their re-housing. Checks are made on an applicant's current circumstances before an offer of a tenancy is made.
3.3	If a Registered Provider is aware of inaccurate information that has been provided by an individual to try to secure housing, they will notify the council, who will determine if a fraudulent application has been made.
4.0	Sanctions
4.1	Homes Direct reserve the right to disqualify any applicant from the housing register, withdraw any offer of a tenancy or assist in recovering possession of an existing tenancy if an applicant has knowingly given false information.
4.2	Any person deliberately providing false information could be suspended from the Housing Register for a certain length of time or even removed from the Housing Register.
5.0	Redress
5.1	Any person who knowingly withholds any information about their housing application or deliberately provides false information will be guilty of committing a criminal offence, and could face a fine if convicted.
5.2	Any person who obtains a tenancy by deception could face County Court Action to evict them (Housing Act 1996 Part VI), prosecution by the council and ordered to pay a fee up to £5,000.

Procurement Fraud

1.0	Context
1.1	Procurement fraud covers a wide range of illegal activities from bid-rigging during the pre-contract phase through to false invoicing in the post contract award stage. In 2011 it was estimated that procurement fraud losses to local government were estimated to be £855m across the UK.
1.2	It can be carried out by those inside and outside the council and is notoriously difficult to detect. The emphasis of the council's counter fraud activity in this area is therefore on deterring fraud.
2.0	Deterrence
2.1	The council utilises a range of activities to prevent and deter procurement fraud at all stages. These include procedures for tender opening which minimise the risk of tender levels being rigged through inappropriate information release and purchasing order systems which separate out role for authorising orders and payments. Checks are also made when suppliers are set up on the council's procurement system or when changes to details, such as bank accounts are requested. The latter has been a recent area of growth in fraudulent activity.
2.2	Publication of all transactions by the council with a value over £500 and details of current and forthcoming contracts via the Contracts Register also creates a transparent culture which minimises some aspects of the risk of fraudulent procurement activity.
2.3	Both councillor and officer Codes of Conduct require disclosure of any personal or pecuniary interests in contracts to be let by the council. Once such interests are declared, arrangements are put into place to exclude the relevant individual from the decision making process. These arrangements both reduce the risk of procurement fraud and protect the individual and the council from allegations. Such disclosures are also required to be reported in the council's Annual Accounts in line with regulatory requirements.
2.4	Part of the routine checks carried out by Internal Audit each year includes sample checking of orders and payments for correct authorisation and delivery of the specified goods and services. This will include checking for double and other overpayments. Increasing data analytics will be used to detect anomalous behaviour. In addition the National Anti-Fraud Network provides up to date intelligence alerts on fraud against local government which inform Internal Audit plans.
2.5	The council's Whistleblowing Policy provides an opportunity for people inside and outside of the council to raise concerns about any aspect of the procurement process.
3.0	Detection, sanctions and redress
3.1	When procurement fraud is suspected, the matter will be reported to the Chief Finance Officer and Internal Audit. Referral to the Police will be made at the earliest appropriate opportunity, particularly if offences under the Bribery Act 2012 are suspected.

3.2	The Procurement Procedures in the Constitution require that all council contracts must contain an appropriate clause which provides protection and the right to terminate the contract in the event of a supplier offering any inducement, committing fraud or committing an offence under the Bribery Act.
3.3	The council will explore all possible avenues to recover any losses incurred as a result of proven procurement fraud from any individuals or organisations involved.

Other Fraud

1.0	Context
1.1	Other appendices in this strategy deal with the highest fraud risk areas for this council. However, it must be recognised that there are many areas of fraud risk which have the potential to affect the council or its services users.
1.2	<p>Examples include:</p> <ul style="list-style-type: none"> • Payroll Fraud • Grants – the council has four main areas of grant activity, each with their own criteria of eligibility: <ul style="list-style-type: none"> ○ Member Empowerment Fund ○ Community Facilities Fund ○ Community Services grants e.g. for advice and counselling services ○ Homelessness Prevention • System Hacking – exposure of personal data that could be used for identity theft • False insurance claims
1.3	All of the above areas of fraud risk have rigorous systems of internal control to reduce fraud risk, including separation of duties where appropriate. They are also subject to periodic review by Internal Audit, including checks by specialist consultants as appropriate.
1.4	Although these areas are considered low risk within this council, monitoring and review of counter fraud activity and emerging fraud threats will be maintained and additional measures taken if the risk level increased. if a fraud is suspected
1.5	If fraud is suspected in one of the above areas, or an area not specifically covered elsewhere in this document, it will be investigated in line with the general provisions of this strategy, including imposition of sanctions and redress where appropriate and improvements to the preventative measures.

Overpayment Policy

1.0	Context
1.1	Responsibility for the investigation of Housing Benefit fraud transferred to the Department for Work and Pension on 1 December 2014. However, East Northamptonshire Council has responsibility for the action taken on Housing Benefit overpayments. This includes deciding whether an overpayment has occurred and whether it is recoverable either as a whole or in part. This discretion includes remitting the amount where appropriate circumstances dictate i.e. ill health etc.
1.2	We must identify the amount overpaid, the period during which overpayment occurred and decide whether it is legally recoverable. This is done in accordance with current legislation, official guidance and our office procedures. Part of this process is to notify the 'person affected' by the overpayment and take recovery action, if appropriate. Care must be taken to correctly classify the overpayment, so that the correct rate of subsidy can be claimed. The council is committed to recover overpaid Housing Benefit wherever possible.
1.3	Overpayments of Council Tax Support are transferred to the claimants council tax account and recovered via Council Tax recovery procedure. This will include court action if necessary.
2.0	Deterrence
2.1	We will minimise overpayments by making accurate and timely payments of benefit.
3.0	Detection
3.1	We must identify the amount overpaid, the period during which overpayment occurred and decide whether it is legally recoverable. This is done in accordance with current legislation, official guidance and our office procedures. Part of this process is to notify the 'person affected' by the overpayment and take recovery action, if appropriate.
4.0	Sanctions
4.1	The council has adopted a 'firm but fair' policy towards the collection of outstanding debts. Debtors will be given every opportunity to reach a satisfactory arrangement for the repayment of their debts.
4.2	The process for recovering overpaid Housing Benefit (if recoverable) is: <ul style="list-style-type: none"> • An invoice will be raised and sent to the claimant and/or landlord informing them that an overpayment has occurred. This will be issued the day after the overpayment is raised. A decision notice will also be enclosed to explain why an overpayment has occurred. Details of the appeal procedure will accompany these documents. • Four weeks after the calculation of the overpayment, if the claimant is receiving benefit, an on-going deduction will be made from that benefit. Such deduction to be in line with DWP guidelines. • If no response is received a reminder notice will be issued 14 days after the invoice is issued. • If no response is received after a further 14 days a 'Seven Day Letter' will be issued • Following issue of the 'Seven Day Letter', if no response is received within 14 days a further letter will be issued stating that if contact is not made within 10 days, details of

	<p>the overpayment will be forwarded to the County Court.</p> <ul style="list-style-type: none"> • A 2nd solicitor's letter will be issued after a further 10 days has expired, where no response has been received.
4.3	<p><i>Target: We aim to despatch an invoice for the overpaid Benefit the next working day after the overpayment is calculated. The recovery timetable (shown above) follows on from this date if payment is not forthcoming.</i></p> <p><i>We aim to collect 40% of the overpayment in the financial year in which the debt was raised</i></p>
4.4	Other forms of recovery
4.4.1	If the debtor makes contact at any point during the recovery process a suitable repayment plan can be negotiated. The repayment plan will be tailored to the individual circumstances of the claimant but in general, a target of repayment within one year will be sought.
4.4.2	Where claimants are in receipt of certain other prescribed benefits e.g. Income Support, Personal Independent Payment, Invalid Care Allowance, Mobility Allowance or State Pension an application will be made to DWP for a deduction to be made directly from that benefit.
4.4.3	All credits on a council tax account will be checked to see if there is an outstanding overpayment. If so, permission will be sought from the claimant to transfer the credit.
4.4.4	Where judgement has been obtained but the defendant has not paid the debt, one or more of the following actions will be considered: Oral examination, Garnishee and Charging Order or Warrant of Execution. In the case of a 'blameless' tenant deduction will be from the landlord
4.4.5	If the tenant moves to a new area and continues to receive housing benefit, a request will be made to the council for that area to make a deduction from the benefit.
4.4.6	Where a claimant is working we will apply direct to their employer for a Direct Earnings Attachment.
4.5	Accounts to be written off
4.5.1	At intervals of not more than three months, progress on recovering debts will be reviewed by the Senior Benefits Officer. Where it is apparent the debt is irrecoverable and all means of collection exhausted, then the debt will be submitted for write off. However, if the customer subsequently qualifies for benefit then the debt will be reinstated and recovery recommenced.
4.5.2	<ol style="list-style-type: none"> 1) Amounts of less than £1,500 will be authorised by the Benefits Manager. 2) Amounts over £1,500 shall be authorised by the Section 151 Officer.
4.6	Bankruptcy
4.6.1	Where bankruptcy proceedings have been commenced a claim will be lodged in accordance with the Insolvency Act 1986.
4.6.2	Once acknowledgement of our claim is received from the Official Receiver, if he has indicated a dividend will not be paid, the debt will be written-off.

4.7	Tracing absconders
4.7.1	We will use all legal means available to trace the forwarding address of a claimant, including contacting their landlord, other local authorities and checking the Customer Information System (CIS).
5.0	Redress
5.1	Once all means of recovery have been expired, consideration will be given to the issue of a county court judgement where this is appropriate and no agreement to repay has been reached.
6.0	Subsequent action
6.1	The council recognises the need for continuous improvement in its services. In order to see this process working in the recovery of our overpaid benefits, we will adopt the following strategy:
6.2	We will use our monthly performance monitoring systems to maintain and inform an overview of the success of our collection procedures and then tailor our actions to responding to the changing dynamics of the environment in which we are operating.
6.3	We accept that improved performance will not always be determined by purely increased collection rates but should be judged in the broader context of enabling other criteria, such as promoting key council priorities (including our 'firm but fair' collection policies).

Sanctions/Prosecution policy

1.0	Introduction
	This document sets out the council's approach towards dealing with Council Tax Support Fraud once it has been established. It should be read in conjunction with the council's enforcement protocol. A number of sanctions are open to councils including cautions, penalties and prosecutions
2.0	Purpose
2.1	Deterrence is the cornerstone of this policy. The message should be clear 'Fraud is theft'. Where fraud is proven, an appropriate sanction will hopefully dissuade the offender re-offending. By publicising successful prosecutions a firm message is sent to all who might attempt the same thing.
3.0	Imposing sanctions – guidelines
3.1	Each case will be determined having regard to its individual circumstances; the criteria set out in section 6 will be used to assist this process. Where it is determined a sanction should be imposed, the appropriate one will be determined having regard to the guidance below
3.2	When imposing a sanction regard must be had to the 'test of rationality' to ensure a sanction is not imposed which is greater than any sentence a court might impose.
3.3	Cautions
3.3.1	A caution, properly administered leaves the defendant with a strong message that they have done wrong, but that they will not be prosecuted this time. It lends weight to the proceedings and is best employed where the amount involved is not sufficient to warrant the cost of a prosecution. Proven frauds involving theft of relatively small amounts of benefit (less than we would prosecute for) could be properly dispensed with in this way. <i>Note: Offenders must admit to the offence under an Interview Under Caution before a caution can be offered.</i>
3.4	Administrative Penalties
3.4.1	For Council Tax Support, under the Council Tax Support Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013, there are circumstances where a fixed penalty is available as an alternative to prosecution:
3.4.2	Offences <ul style="list-style-type: none"> • Intentional delay or obstruction of an authorised officer, • Making a false statement to obtain a reduction and • Knowingly failing to give a prompt notification of a change in circumstances affecting a reduction.

3.4.3	Under regulation 11 of the Council Tax Reduction Schemes (Detection of Fraud & Enforcement) (England) Regulations 2013 we can offer a penalty to an individual, the level of the penalty will be calculated based on 50% of the 'excess reduction' that the person received. This 'excess reduction' would be from the date that the incorrect reduction was awarded to the date that the authority becomes aware (or reasonably should have become aware) that it had been awarded. The penalty can range from a minimum of £100 and a maximum of £1,000.
3.4.4	The council has the discretion to offer an Administrative Penalty in place of prosecution. A penalty can only be offered to an offender, as an alternative to prosecution, if there are sufficient grounds for a prosecution. If the Offender refuses the offer of a fixed penalty the council must then prosecute. After receiving the recommendations of the fraud team, the Benefits Manager shall decide if a penalty is more appropriate having regard to the individual circumstances of the case.
3.5	Prosecutions
3.5.1	Authorities can prosecute for offences under Statutory Instrument SI 50112013 which provides new regulations and powers in relation to the investigation by Local Authorities of fraud in claims made under the new Local Council Tax Reduction Scheme from April 2013.
4.0	Sufficiency of evidence
4.1	No prosecution will be commenced unless the council is satisfied the evidence is sufficient, admissible and reliable. There must be a realistic prospect of conviction having regard to the full circumstances of the case. This will form the evidential test.
5.0	Sanction criteria
5.1	The conclusion of an investigation may result in a Fraud being established. In such cases consideration will be influenced by the factors below in deciding what sanction is appropriate. i) The seriousness of the offence and the number of times the offence has been previously committed. ii) The amount of the money defrauded and duration the fraud was perpetrated. Small amounts, unless persistent, may not be economical to prosecute. iii) The claimant's physical and mental condition. iv) The claimant's social factors e.g. age, family circumstances or language difficulties. v) The defendant's previous record of offences. vi) Whether there was collusion or premeditated intent. vii) Conformity to legislative requirements of both documentary evidence and manner of enquiries undertaken. viii) The claimant's voluntarily disclosure of the fraud prior to investigation. ix) Whether proceedings are within any time limits set for prosecution. x) Any extenuating factors pertinent to the case.
6.0	Procedure
6.1	Each case will be reviewed once all enquiries have been completed; the Senior Benefit Officer (Fraud, Appeals & Overpayments) will carry this out and a recommendation made as to which sanction is appropriate to the case. The Benefits Manager will then consider the recommendation and authorise the appropriate sanction.

6.2	Decisions to prosecute must be fair and consistent. It is recognised that a decision to prosecute is a serious step
7.0	Recovery of overpayment
7.1	In addition to considering prosecution or penalty, the council will also seek to recover the full fraudulent overpayment in accordance with its Overpayment policy (see Appendix 7). Where prosecution has taken place a claim for compensation will be made towards the overpayment and the remainder will be sought through civil action as appropriate which may include a charge being placed on the claimant's assets. If relevant the powers contained within the Proceeds of Crime Act 2002 (Asset Confiscation) will be used.
8.0	Recovery of costs
8.1	The council will always seek to recover any costs incurred in pursuing prosecution.

Code of Conduct for revenues and benefits officers

1.0	Aims
1.1	It is important that the public has faith in the integrity of the council staff. It is the responsibility of each officer to see this is maintained.
1.2	The code aims to identify the minimum standards of professional conduct required of staff under taking counter fraud activity and to ensure officers adopt a uniform approach in their dealings with colleagues and the public. It is the duty of management to maintain this code and ensure staff understand and comply with it.
2.0	General principles
2.1	Officers must abide by the Corporate Fraud Strategy, Counter Fraud Strategy, Prosecution Policy and this Code of Conduct. In addition, the council's Confidential reporting code provides protection to staff reporting suspected internal fraud.
2.2	In addition, the code should be read in conjunction with the officer code of conduct contained in the council's constitution, written procedures, work instructions, conditions of employment and legal requirements.
2.3	Throughout an investigation the codes of practice attached to the Police and Criminal Evidence Act 1984 (PACE) and the Criminal Procedure and Investigations Act 1996 will be followed
2.4	The relevant provisions of the European Convention on Human Rights and the Human Rights Act 1998 will be adhered to at all times.
2.5	The code applies to all counter fraud staff both during and outside working hours and will be applied in a reasonable and objective manner.
2.6	Every officer must report any suspicions of fraud they detect using the appropriate referral form. Any suspicion of internal fraud must be reported to one of the following <ul style="list-style-type: none"> • the Head of Service • the Monitoring Officer • the Chief Finance Officer • the Chief Executive
2.7	The investigating officer is under a duty to investigate suspected Council Tax Support fraud thoroughly and to pursue all reasonable lines of inquiry.
2.8	Officers must at all times operate within the law and comply promptly with any legal obligations or departmental instruction.
2.9	Officers must not abuse their authority. They must not act, or imply that they could act, in a way which is beyond the actual limits of their powers

2.10	Investigators must act openly and with complete impartiality in their investigations and treat members of the public and colleagues with courtesy, respect and consideration. They must never engage in, or condone, any form of harassment, victimisation or discrimination.
2.11	Enthusiasm must not be allowed to override practical Health and Safety requirements, particularly with regard to instructions concerning visiting and interviewing in potentially violent situations. Prior to commencing an investigation the officer shall check if the case is identified as 'sensitive', in which case two officers must be present at any interviews.
2.12	All information of a personal nature is subject to the Data Protection Act 1998 and is highly confidential. Any unauthorised disclosure by officers will result in disciplinary procedures and could result in prosecution
3.0	Specific circumstances
3.1	<i>Visiting premises</i>
3.1.1	When visiting the premises of distressed or agitated people, officers will proceed with care. Officers must adhere to the Potentially Violent Persons protocol and, where necessary, two officers will make the visit.
3.1.2	Officers will always introduce themselves and produce their identification cards.
3.2	<i>Vulnerable people</i>
3.2.1	If visiting elderly people unannounced, visits will be made during hours of daylight and usually between 9am and 5pm.
3.2.2	An interpreter will be provided when interviewing people unable to speak English.
3.2.3	Where people to be visited are known to have learning difficulties or mental health problems visits must first be authorised by the appropriate manager who is responsible for ensuring appropriate assistance/facilities are available to assist the interviewee
4.0	Declarations of interest
4.1.1	All council officers are required to make a declaration of interest where a conflict of interest may arise between an officer's private circumstances and his/her official duties.
4.1.2	An officer with membership of any organisation, which is capable of influencing the outcome of an investigation, must declare their interest to their line manager, who will report it to their Head of Service.
4.1.3	When disclosing information, officers must ensure the disclosure would not breach the Data Protection Act 1998.

4.1.4	A breach of this code of conduct will be considered a disciplinary matter.
4.1.5	<p>In addition, where this extends to any of the circumstances listed below, it is a revenues and benefits employee's responsibility to bring such a declaration to the notice of the Benefits Manager. The circumstances are:</p> <ul style="list-style-type: none"> • Receiving Housing Benefit or Council Tax Support • Acting as a landlord or agent. • When sharing a household with a landlord, agent or anyone who is claiming Housing Benefit or Council Tax Support. <p>The officer concerned must not be involved in the assessment or consideration of that claim.</p>
4.1.6	Any employee with a relative claiming benefit must not be involved in the assessment, consideration or investigation of that claim. In this respect relative means father, mother, sister, brother, son, daughter, aunt, uncle, niece, nephew, cousin or any other close relative. They must disclose this relationship immediately..
4.1.7	If an officer is suspected or found guilty of benefit or council tax support fraud they must immediately disclose this.
4.1.8	Records of declarations will be held by the Benefits Manager

Revenues and benefits data matching policy

1.0	Context
1.1	Data matching is an important means of identifying fraudulent claims for Housing Benefit and Council Tax Support. Every year significant frauds are identified using this means.
2.0	Data Matching defined
2.1	Within this policy 'data' refers to personal information such as name, address, date of birth etc., which is held in paper or electronic format. Data matching is the process wherein data from various sources is electronically compared and cross checked in such a way that inconsistencies can be highlighted.
2.2	This can be accomplished on a national scale, cross checking such records as council payrolls against benefit data. Inconsistencies are then related back to local authorities for investigation
2.3	An example of the type of inconsistency that can be identified using this means is where a benefit claimant is in receipt of a private pension that they have not declared.
3.0	Where the data comes from
3.1	The data used for matching comes from different sources, these include:- <ul style="list-style-type: none"> • East Northamptonshire Council which holds data in connection with claims for Housing Benefit and Council Tax Support. • The Department for Work and Pensions which has a number of computer systems, each which containing information relating to benefits and National Insurance contributions.
3.2	All councils hold data on their pay-roll systems of salaries, wages and pensions.
4.0	Who matches the data?
4.1	There have been two main data matching agencies, the Department for Work and Pensions (Housing Benefit Matching Service) and National Fraud Initiative. The Government is currently in discussions with the Cabinet Office, the National Fraud Authority in the Home Office and the Department for Work and Pensions about taking on operational ownership of the National Fraud Initiative. New legislation would enable them to be transferred to any government department.

5.0	What we do with the data
5.1	Data matching will only identify cases where there appears to be an inconsistency. Data matching agencies forward details of inconsistencies (called referrals) to the appropriate council for further action. The information includes names, addresses and details of the information forming the referral.
5.2	Upon receipt of the data, a trained officer compares the referred data with Housing Benefit and Council Tax Support records to ensure that the council has not received further information since the date of the match.
5.3	If the discrepancy has occurred due to an official error, the error is brought to the attention of the person concerned
5.4	If the referral shows that the claimant may not have declared the correct information, the Housing Benefit will be referred to the Department For Works and Pensions and the Council Tax Support element will be investigated by East Northamptonshire Council. The investigating officer will treat the claim in exactly the same way he would any other referral and conduct an appropriate investigation.
6.0	Security of data
6.1	At all times the data is treated as highly confidential. Files are kept in locked cabinets and data is sent via a secure email using GCSX. Officers working on this data are bound by the policies and codes of conduct comprising the Counter Fraud Strategy.
7.0	Staff consultation
7.1	If data being compared includes the personal data of council staff, then prior to the commencement of the data match all staff are notified by memorandum.
8.0	Principles of Data Protection and Human Rights
8.1	At all times the rights and responsibilities laid down in legislation pertaining to the rights of the individual and data protection will be observed and all staff are bound by this requirement.
8.2	In particular the following requirements must be observed:- <ul style="list-style-type: none"> • <i>Data Protection Act 1998</i> Data will be held in accordance with the principles of the Data Protection Act 1998 (Schedule1, part 1). • <i>European Convention on Human Rights</i> Article 8 of the European convention on Human Rights states: <ul style="list-style-type: none"> ○ Everyone has the right to respect for his private and family life, his home and his correspondence. ○ There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interest of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

9.0	Outcome of the exercise
9.1	At the end of the exercise, any case which has been found to have been fraudulent will be dealt with in accordance with the policies contained within the Corporate Counter Fraud

Action plan

	Proposed action	Responsible officer	Completion date
1	Create dedicated area on EUNICE to bring all Counter Fraud documents into one place for the use of staff and employees	Monitoring Officer	31/3/15
2	Ensure that fraud risks and controls are considered and recorded as appropriate as part of the roll out of the new Risk Management system	Finance Manager	31/1/15
3	Further training on best practice and fraud awareness for the Governance and Audit committee	Chief Finance Officer	31/3/15 and after local elections
4	Include reference to Fraud Risk in review of Knowledge, Skills and Behaviours framework	Head of Resources and OD	30/9/15
5	Develop guidance for managing fraud risks in partnerships and shared services	Finance Manager	31/12/15
6	Refresher training for all staff on approach to counter fraud and Whistleblowing arrangements	Monitoring Officer	30/6/15
7	Develop Performance Indicators to support the counter fraud strategy	Finance Manager	30//6/15
8	Includes question in the annual staff survey, or other means if appropriate, to determine staff awareness of, and confidence to use, the Whistleblowing Policy.	HR Manager	31/12/15
9	Refresh procurement fraud activity	Finance Manager with Welland Procurement Unit and Internal Audit Team	31/3/16
10	Review level of resource available for Counter Fraud activity against fraud risk as part of Annual Governance Statement preparation	Chief Finance Officer	31/3/16