

Counter Fraud Strategy Action Plan
as at October 2019

Action	Objective	Lead Officer(s)	Timeframe for implementation	Update (subject to quarterly review)
A01: To incorporate a specific, annual, documented assessment of fraud risks in the annual Audit Planning process.	To ensure the Council remains aware of its fraud risks and seeks proportionate assurance over the management of these risks.	Head of Internal Audit and Director of Corporate Services	31 st January 2018 and embedded on an annual basis.	Completed as part of Audit Planning process. Various audits included in the Audit Plan for 2018/19 as a result and now embedded in annual audit planning (performed again for 2019/20 plan).
A02: To review the Council's communications strategy following fraud investigations (both corporate and benefits).	To ensure the Council utilises this opportunity to act as a deterrent and to promote the Council's fraud strategy. To ensure the harm caused by frauds is clearly communicated.	Communications Manager	31 st March 2018	Completed. Internal and external communications issued following recent court outcome.
A03: To raise awareness of the Leicester City fraud partnership arrangement and ensure Council staff are making suitable referrals and utilising this source of advice and guidance. To arrange a session with relevant staff (customer services/housing) and invite Leicester City representative to discuss the	To maximise use of fraud resources and benefit from joint working.	Revenue Business Partner	31 st December 2017	Completed – session delivered.

arrangements with these officers.				
A04: To include consideration of fraud risks in the planned review of the Council's corporate risk management strategy (can be informed by A01 above).	To ensure management of fraud risks is embedded corporately.	Director of Corporate Services	September 2018	Completed. Included in the Central Services risk register and at higher level in corporate risk register.
A05: To specifically include assessment of counter fraud and corruption controls in the next AGS (informed by work of Internal Audit and annual assessment) and to reflect the outcomes of this assessment.	To demonstrate the robust arrangement in place at the Council to detect, prevent and investigate fraud.	Director of Corporate Services	June 2018	Completed – AGS includes summary of counter fraud developments in year and risk assessments.
A06: To update online counter fraud training module on the new portal.	To embed staff awareness and ensure every officer completes a fraud awareness training session.	Head of Internal Audit / HR	September 2018	Completed - updated version to be made available on Learning Pool.
A07: Publicity around International Fraud Awareness Week.	To raise staff awareness and build confidence in raising concerns.	Head of Internal Audit / HR	November 2018	Completed - regular articles and publicity provided.
A08: Update Counter Fraud and Corruption policy to reflect latest staffing structure and contact details.	To ensure information is available to all staff to enable them to report fraud to the correct senior leads and policy details remain accurate.	Head of Internal Audit / Director of Corporate Services	June 2019	Completed – updated version uploaded to intranet.
A09: Review of Anti-Money Laundering policy.	To ensure the policy remains up to date and continues to reflect latest legislation and best	Head of Internal Audit / Director of Corporate Services	September 2019	Completed – policy revised and adopted.

	practice.			
A10: To introduce record of all awareness campaigns / staff alerts relating to emerging fraud risks.	To evidence awareness work undertaken.	Head of Internal Audit	September 2019	Completed – template developed and in use.