

NHDC / SAFS Action Plan 2019/2020

CIPFA Principles	Goals & 6Cs	Activities	Responsible Officer	Progress to March 2020
ACKNOWLEDGE	Fraud is acknowledged as a Risk for the Council CULTURE	The Council has in place Anti-Fraud and Corruption Strategy & Fraud Response Plan	Chief Executive/ Service Director - Resources	New F&C Policy to FARC on 10.9.2019
		Inclusion of Fraud Risks and the Councils actions to manage/mitigate/reduce this in its Annual Governance Statement. Review the Councils Money Laundering/ Bribery/ Whistleblowing/ Cyber-Crime Policies	Service Director - Resources/ Service Director – Legal and Community	Complete
		Audit Committee and Senior Managers ensure compliance with CIPFA best practice in their counter fraud arrangements	Service Director - Resources	FARC July 2019. New Policy 2019
		The Council will make it clear through its policies and codes of conduct for staff and Members that fraud and corruption will not be tolerated.	Service Director – Legal and Community/ Corporate Human Resources Manager	Complete
PREVENT	The Council has a robust communication policy demonstrating its commitment to prevent fraud COMMUNICATION	The Councils Communication Team will publicise prosecutions, anti-fraud campaigns and provide internal communications to staff on fraud awareness	Communications Manager	SAFS worked with Comms Team on BB campaign in May 2019 and the Fraud Awareness Week in November 2019.
		Access to SAFS fraud reporting tools (web/phone/email) for staff, public and elected Members.	SAFS Manager	All staff can report using 'white-listed' forms. New policy includes all reporting lines
		The Council and SAFS will provide fraud awareness or specific anti-fraud training across all Council services and review the E-Learning Training for staff	SAFS Manager / Corporate Human Resources Manager	E-learning Package in place supported by HR.
		SAFS will provide fraud alerts to appropriate officers/staff/services from Action Fraud/ NAFN/ Police .	SAFS Manager	22 Alerts issued to NHDC Senior Managers
PURSUE	Co-ordination of effort, sharing of best practice, data, fraud alerts and new threats. COLLABORATION	Implement the contract for the Council to join the Herts <i>FraudHub</i> in 2019.	Service Director - Resources/ SAFS Manager	Complete
		Review data sharing agreements/protocols to ensure compliance with DEA & GDPR/DEA	Service Director – Legal and Community / SAFS Manager	Complete
		Deliver the NFI2018/19 Exercise	Service Director - Resources/ SAFS Manager	Resolved internally. Reports & Matches are being reviewed by officers.
		Work with DWP to deliver CTRS/HB joint working 2018 roll-out	Service Director - Resources/ SAFS Manager	JW in place with Stevenage DWP Office.
	Have the highest levels of professional standards COMPETENCE	Work with other organisations, including private sector, to improve access to data	SAFS Manager	SAFS work with SAS Analytics, Credit Industry Fraud Avoidance Service & Hooyu
		All SAFS staff will be fully trained and accredited	SAFS Manager	All SAFS Staff trained and ACFS/T/M or equivalent.
		All investigations will comply with relevant legislation and Council Policies	SAFS Manager	SAFS conduct 121 with staff, 'dip' sample cases and management review all closures and any cases referred for sanction/prosecution
		SAFS will work with the LGA and Cabinet Office to support the roll out of a Counter-Fraud Profession	SAFS Manager	HCC part of a collective (London based) application to join the Profession by October 2020.
Ensuring the Counter-Fraud Measures are appropriate to the range of fraud risk. CAPABILITY	SAFS will provide reports to Board and SAFS Champions quarterly on anti-fraud activity at the Council	SAFS Manager	S. 151 is a Board member and receives quarterly service reports. FARC Reports from SAFS in the Fwd Plan	
	SAFS will record and report on all fraud referred, investigated and identified	SAFS Manager	All cases now recorded and reported via SAFS case management system (OPUS)	
	SAFS will review fraud trends and new threats and report on these to Council officers	SAFS Manager	All recent published reports from various agencies reviewed and shared with officers. Fraud Alerts remain in place	
	SAFS and the Councils Legal and Debt teams will seek to 'prosecute' offenders and recover losses	SAFS Manager / Service Director – Legal and Community / Service Director - Resources	Good working relationship between legal team & SAFS.	
Develop the right level of resources to deal with the level of fraud risk CAPACITY	The Council will review its ROI from SAFS Membership	Service Director - Resources	Champion Meetings and Board Reports in place	
	SAFS will assist the Council in providing its Transparency Code (Fraud) Data annually	SAFS Manager	Provided in Annual Report to FARC in July 2019	
	Reports for Finance Audit and Risk Committee on all Counter Fraud activity	Service Director - Resources/ SAFS Manager	Report to FARC agreed in Fwd Plan	
	SAFS will work with bodies including MHCLG/LGA/CIPFA/FFLB to develop anti-fraud strategies at a national level that support fraud prevention in local government	SAFS Manager	SAFS involved with CIPFA/CIPFA/LGA/FFCLB in developing the Local Government AF Strategy 2020-2025	