

## ACTION PLAN 2010/11

An action plan to improve further the Authority's arrangements for countering fraud and corruption is set out below

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS
<b>OBJECTIVE: Apply checklist from 2009 Audit Commission report "Protecting the public purse"</b>			
Establish WDC compliance with Audit Commission checklist in order to identify any gaps and to consider if further counter fraud measures need to be introduced.	Audit and Risk Manager	September 2010	Completed. Compliance with the checklist was established and reported to the November 2010 meeting. A number of gaps were identified and these have been addressed. A copy of the checklist showing only those areas where further action was required and the response is attached as Appendix C.
<b>OBJECTIVE: WDC counter fraud measures form part of the governance arrangements for partnerships</b>			
Examine the governance arrangements for all WDC partnership ventures and ensure that WDC counter fraud and corruption measures are included.	Audit and Risk Manager	December 2010	<p>The governance arrangements for partnerships are enshrined in the Council's Partnership Policy and Partnership Checklist both of which were approved by Executive in March 2010. Every partnership has a lead officer who has completed a Partnership Checklist which has been reviewed by the Deputy Chief Executive who in turn has, where necessary, highlighted actions that need to be taken to improve the robustness of the partnership arrangements.</p> <p>For any new partnerships a report is presented to Executive spelling out the reasons for the proposed partnership along with a completed Partnership Checklist.</p> <p>Neither the Policy nor the Checklist make specific reference to fraud and corruption but on reflection this action point may not be entirely relevant given that most of the partners involved are either local authorities, government agencies or small organisations. The point can be addressed by including a general reference in any new or renewed partnership agreements along the lines that business will be conducted openly, transparently and fairly with a zero tolerance attitude to fraud and corruption.</p>

## ACTION PLAN 2010/11

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS
Ensure that all those involved in partnership arrangements are clear on this requirement.	Audit and Risk Manager	December 2010	The Deputy Chief Executive oversees all partnership arrangements and will be the person approving the format and content of the agreement.
<b>OBJECTIVE: Improve publicity of successful fraud cases</b>			
Make arrangements to publicise details of successful prosecutions in fraud cases in all available and appropriate media sources in order to act as a deterrent.	Head of Customer and Information Services	December 2010	<p>The progress reported to the November meeting was –</p> <p>Details of the numbers of successful prosecutions and the numbers of people receiving financial penalties and formal cautions were published in the summer 2010 edition of District Focus. Very brief personal details occasionally appear in the “Court Reports” feature of The Courier. Following the next successful prosecution a press release will be prepared and submitted for publication to the Communications Officer.</p> <p>Revenues did earmark a case to publicise but a referral to Crown court has delayed it. Most cases culminating in a prosecution are the result of a joint investigation with the DWP and they deal with the publicity.</p> <p>It is planned to publish details of the number of successful prosecutions in a forthcoming edition of District Focus.</p>
<b>OBJECTIVE: Ensure the implications of the Bribery Act 2010 for the public sector are addressed</b>			
Establish the implications of the Bribery Act 2010 for WDC and take action as appropriate in respect of the Strategy and advice to Members and managers.	Audit and Risk Manager	September 2010	<p>Completed. The implications for the strategy were considered and it was not felt that any amendment was necessary at this stage.</p> <p>An Intranet notice for staff was posted. Briefings were issued for Members and senior managers.</p>

## ACTION PLAN 2010/11

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS
<b>OBJECTIVE: Effectively manage the council's role under the National Fraud Initiative (NFI)</b>			
Address the issues identified impairing the council's ability to meet its obligations under the NFI, including strengthening the management framework and raising awareness.	Audit and Risk Manager	July 2010	Completed. A report was presented to SMT in July and to Finance and Audit Scrutiny Committee in August.  An update report was presented to the March 2011 meeting.
<b>OBJECTIVE: Ensure Internal Audit staff remain aware of best practice and new developments</b>			
Arrange for attendance of Internal Audit staff at appropriate training events and professional networking groups.	Audit and Risk Manager	March 2011	Ongoing. Appropriate and affordable training events have been attended during the year.
<b>OBJECTIVE: Review Strategy and Action Plan</b>			
Review the currency of the Anti Fraud and Corruption Strategy annually and report to Members.	Audit and Risk Manager	June 2011	The Strategy, first adopted in 1995, was revised in 2005 and it remains relevant to the Council's current structure and operation. There is no need for any cosmetic adjustment as it deliberately avoids any names, job titles, addresses etc. Any attempt to produce a new strategy that wasn't simply an amended version of the current strategy would be time consuming and not cost effective.
As part of the review, benchmark the Strategy against other publicly available examples.	Audit and Risk Manager	January 2011	A sample of 12 other strategies was selected at random from the internet together with 3 from the other Warwickshire authorities. There was considerable variation in length, style and presentation but the core message was very similar in all of them. No omissions in the WDC strategy were identified.

## ACTION PLAN 2010/11

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS
Obtain and examine latest CIPFA and Audit Commission guidance on fraud and corruption and consider if any of the recommendations impact on WDC's fraud prevention procedures or the policy and strategy.	Audit and Risk Manager	December 2010	The Audit Commission's latest report on fraud in the public sector "Protecting The Public Purse 2010" was published at the end of October. A copy has been received and its content has been examined. Again it contains a checklist for those responsible for governance. It is similar to the previous checklist but it includes a number of new areas so it will be completed as part of the 2011/2012 action plan.
Present an annual report recording progress against the Action Plan together with a revised Action Plan.	Audit and Risk Manager	Annually	Undertaken as part of this report.
Present a mid term report recording progress to date against the Action Plan.	Audit and Risk Manager	November 2010	Completed.