

## Anti Fraud and Corruption Action Plan 2017/18

## Review of progress in achieving the 2017/18 Action Plan

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS / ACTION NEEDED
<b>OBJECTIVE: Undertake all assignments in the 2017/2018 Audit Plan and any investigations required</b>			
Complete all of the audits contained in the annual Audit Plan approved by members in April 2017. The scope and objectives of the audits will include an assessment of the controls that indirectly assist in fraud prevention and detection.	Audit and Risk Manager	March 2018.	A key performance measure for the Internal Audit Team is the completion of the annual Audit Plan that is approved by members each year. Consequently regular meetings take place with the Audit and Risk Manager to monitor progress and if necessary to take remedial action or to make adjustments to the Plan. This year all of the audits in the Plan were completed by the end of March. Confirmation of the existence of sound controls within systems, procedures and services is one of the main objectives of audits and this will contribute to the mitigation of fraud and corruption.
Investigate any fraud or irregularity cases uncovered or referred to Internal Audit. If there are grounds for an investigation report the circumstances, the approach adopted and the outcome to members. Assess the resource implications of any investigations on the Audit Plan and report to Finance & Audit if a shortfall is identified listing the possible options.	Audit and Risk Manager	As required.	The council's Code of Financial Practice requires that Heads of Service notify the Head of Finance or the Audit and Risk Manager of any suspected fraud, theft, irregularity, improper use or misappropriation of the authority's property resources. No such notifications were received during the year.  No examples or suspicions of fraud or irregularity were identified in the course of completing the Audit Plan.

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS / ACTION NEEDED
Report the outcome of all completed audit assignments together with the management responses to any recommendations in the action plan to Finance & Audit Scrutiny Committee.	Audit and Risk Manager	Quarterly.	The outcome of all audits completed is reported to Finance and Audit Scrutiny Committee as part of the quarterly report on progress with the Audit Plan. The report includes the management responses to recommendations in the action plan. The current status of the management responses is reported later as part of the regular reporting cycle to ensure that what was proposed has been undertaken.
<b>OBJECTIVE: Promote fraud awareness within the Council</b>			
Post a notice on the council's Intranet as a reminder of the ever present threat of fraud and how to invoke the council's Whistleblowing Policy and Procedure.	Audit and Risk Manager	September 2017.	Completed as planned.
Post a notice reminding staff of the council's Money Laundering rules and the implications of the Bribery Act.	Audit and Risk Manager	February 2018.	Completed as planned.
Continue to attend the council's corporate induction programme to provide fraud awareness sessions.	Audit and Risk Manager	Throughout the year.	All new council employees are required, as part of the induction process, to attend a full day's induction course. As part of that, two members of Internal Audit provide a 30 to 40 minute session on Fraud Awareness. All courses were attended during the year.
Circulate details of any frauds attempted against the council as they occur and details of any potential new fraudulent activity received.	Audit and Risk Manager	Throughout the year.	Details of frauds being attempted are received from a national anti-fraud body but they tend to be frauds against members of the public and not local authorities. No details of frauds against local authorities were received during the year.

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS / ACTION NEEDED
Review the use and benefits of the council's confidential reporting service "In Touch".	Audit and Risk Manager	September 2017.	<p>In Touch is a reporting service that can be used by people who do not feel able to raise concerns either internally or with any of the external options. Retaining the service has been questioned in the past and the response has been that it was worth keeping as it did offer staff another option to raise concerns.</p> <p>This time around the response has been that there are enough options and support mechanisms in place for staff and that In Touch no longer represents value for money. The current subscription will not be renewed.</p>
<b>OBJECTIVE: Participate in data exchange and research initiatives</b>			
Provide data to the National Fraud Initiative (NFI) and respond to referrals received as a result.	Audit and Risk Manager	February 2018.	Completed as scheduled.
Present a report to Finance and Audit Scrutiny on the outcome of the NFI exercise.	Audit and Risk Manager	October 2017.	Completed as scheduled. A report was presented to Finance and Audit Scrutiny Committee on 31 October 2017.
Complete any appropriate surveys of fraudulent activity in local government undertaken by the recognised professional and government bodies.	Audit and Risk Manager	As received.	The demise of the Audit Commission has seen the end of the annual fraud survey "Protecting The Public Purse". It did continue in a different form for a few years in the form of "Protecting The English Public Purse" which was produced following a survey undertaken by The European Institute for Combatting Corruption and Fraud (TEICCAF) but this appears to have been discontinued. Any surveys issued by the recognised bodies would be completed.

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS / ACTION NEEDED
<b>OBJECTIVE: Enable public reporting of suspected fraud or corruption</b>			
Review the Fraud pages on the WDC website and revise and update if necessary.	Audit and Risk Manager	November 2017	The Fraud pages on the WDC website were reviewed as part of an overall review of the website undertaken by the former Website Service Manager in April 2017.
<b>OBJECTIVE: Ensure Internal Audit staff remain aware of best practice and new developments</b>			
Arrange for members of the Audit Team to attend any appropriate and affordable training events and to attend the Warwickshire and Midlands professional networking groups.	Audit and Risk Manager	Throughout the year.	Members of the Audit Team have attended a small number of training events. Very few training events that are affordable and relatively local have been offered this year. A member of the team is in his final year of an MSc course in audit management. Meetings of the Warwickshire and Midlands Audit groups are usually attended.
Arrange to run workshops for the Internal Audit staff on investigative practice following the successful completion of the CIPFA Certificate in Investigate Practice.	Audit and Risk Manager	Throughout the year.	Outstanding as a result of other work commitments and priorities. To be carried forward and undertaken when time permits.

ACTIONS	RESPONSIBILITY	TIMESCALE	PROGRESS / ACTION NEEDED
<b>OBJECTIVE: Review Strategy and Action Plan</b>			
Review the content, currency and format of the Anti-Fraud and Corruption Strategy.	Audit and Risk Manager	January 2018.	<p>The council's Anti-Fraud and Corruption Strategy was approved by members in 1995 following the publication of the first of the Audit Commission's annual reports entitled Protecting The Public Purse. The report changed local authorities' attitudes and approaches to dealing with fraud and corruption which up until then had been somewhat piecemeal and reactive. The report encouraged local authorities to state formally their opposition to fraud and corruption and to develop strategies for minimising the risk. The strategy has undergone a number of minor changes over the years but it is essentially very much as first written.</p> <p>It is a series of fairly broad aims and objectives that make little or no reference to specific procedures, legislation, policies, job titles etc. and so in terms of a statement of intent it still holds good today.</p> <p>The strategies of the other Warwickshire authorities together with ten randomly selected were examined for comparison with the WDC version to see if there were any lessons to be learned.</p> <p>All of the other strategies contain the same basic aims as the WDC version but they vary significantly in length from a couple of pages to over twenty. The longer versions go beyond being a basic strategy and include detailed procedures on whistleblowing, money laundering, bribery etc all of which are covered by other policies or guidance notes here.</p>

<b>ACTIONS</b>	<b>RESPONSIBILITY</b>	<b>TIMESCALE</b>	<b>PROGRESS / ACTION NEEDED</b>
Review any CIPFA or other relevant bodies' guidance on fraud and corruption issued during the year and consider if any of the recommendations require changes to WDC's fraud prevention procedures or the policy and strategy.	Audit and Risk Manager	As received.	The CIPFA Counter Fraud Centre was launched in 2014. Since then it has provided training on certain aspects of fraud prevention and detection and produced various documents and codes but none that have had any impact on how WDC deals with fraud and corruption. No information on guidance produced by other professional bodies has been received.
Present an annual report to Finance and Audit Scrutiny Committee recording progress against the Action Plan together with a revised Action Plan.	Audit and Risk Manager	July 2018.	Completed. Undertaken as part of this report.