
Counter Fraud Management Review, Revised Counter Fraud Policy Statement and Strategy

Report by Chief Officer Audit & Risk

Audit & Risk Committee

30 June 2015

1 PURPOSE AND SUMMARY

- 1.1 The purpose of this report is to provide members with details of the outcomes from the Counter Fraud Management Review and to seek agreement to recommend the revised Corporate Counter Fraud Policy and Strategy for approval.**
- 1.2 Management are committed to minimising the risk of loss due to fraud, theft or corruption and at the same time taking appropriate actions against those who attempt to defraud the Council, whether from within the authority or from outside. The previous review of the Council's approach to tackling fraud was undertaken during 2010 and the resulting Corporate Counter Fraud Strategy was approved by Council in November 2010.
- 1.3 Good practice requirements signalled a need to review the Council's arrangements for tackling fraud to ensure a comprehensive and coherent approach to fraud prevention, detection and investigation. The counter fraud management review project commenced in March 2014 and was completed by the end of 2014.
- 1.4 The report sets out the outcomes of the review of the Council's counter fraud arrangements including current policy, strategy, processes, toolkits and resources. It also describes the recommended improvements to refine the Council's approach to tackling fraud to ensure its ongoing effectiveness and to ensure that the Council is not left in a vulnerable position against the increasing threat of fraud.
- 1.5 A revised Corporate Counter Fraud Policy has been developed (Appendix 1) which will be supported by a revised Strategy (Appendix 2).

2 RECOMMENDATIONS

- 2.1 I recommend that the Audit & Risk Committee:**
- a) **Acknowledges that it is satisfied with the outcomes of the Counter Fraud Management Review and endorse the recommendations for improvement to refine the Council's approach to tackling fraud to ensure its ongoing effectiveness;**
 - b) **Agrees to recommend to Council that the revised Corporate Counter Fraud Policy (Appendix 1) and Strategy (Appendix 2) be approved.**

3 COUNTER FRAUD MANAGEMENT REVIEW BACKGROUND

- 3.1 The size and nature of the Council's services, as with other large organisations, puts the Council at risk of loss due to fraud, theft or corruption. Management are committed to minimising this risk and at the same time taking appropriate actions against those who attempt to defraud the Council, whether from within the authority or from outside.
- 3.2 The changing and increasingly complex environment in which the Council operates, and the complexity of policies, procedures, processes, systems, customer interfaces, legislative requirements, partnerships and joint working arrangements and relationships with other organisations that enable the Council to deliver its services is happening against a backdrop of depressed economic activity in which the fraud risk tends to increase.
- 3.3 The previous review of the Council's approach to tackling fraud was undertaken during 2010 and the resulting Corporate Counter Fraud Strategy was approved by Council in November 2010. Good practice requirements signalled a need to review the Council's arrangements for tackling fraud to ensure a comprehensive and coherent approach to fraud prevention, detection and investigation. The counter fraud management review project commenced in March 2014 and was completed by the end of October 2014.
- 3.4 The objectives of the Counter Fraud Management Review were to:
- Assess efficacy of current prevention, detection and investigation of fraud practices across the Council that reflect the Council's commitment to minimising the risk of loss due to fraud, theft or corruption, and identify and implement improvements as required; and
 - Inform the corporate counter fraud policy, strategy, processes and resources for 2015/16 onwards.
- 3.5 This review is linked to the following national and local priorities:
- Corporate Priority 8 - ensuring excellent, adaptable, collaborative and accessible public services
 - National Outcome 16 - public services are high quality, continually improving, efficient and responsive to local people's needs

4 OUTCOMES OF THE COUNTER FRAUD MANAGEMENT REVIEW

- 4.1 Tackling fraud is an integral part of protecting public finances. Fraud has a serious impact on all parts of the economy. The National Fraud Authority in its 2013 Annual Fraud Indicator report estimates that fraud costs the UK around £52 billion per year. The cost of fraud to the public sector equates to £20.6 billion of which £2.1 billion relates to local government.
- 4.2 The National Fraud Initiative (NFI) in Scotland in its most recent report in June 2014, records outcomes valued at £16 million since it last reported in May 2012. Cumulative outcomes from the NFI in Scotland are now recorded at £94 million. This is a significant return to public finances.
- 4.3 The harm caused by fraud, however, is not just financial, nor is it just Benefit Fraud. Fraud damages local people and communities, damages the Council's reputation and undermines trust in public services. Every pound lost through fraud cannot be spent on providing and delivering quality services that people rely on and which they pay their taxes to get, therefore it is important to have a strong counter-fraud culture and effective counter-fraud arrangements.

- 4.3 The Counter Fraud Management Review 2014 highlighted the following:
- a) Whatever local priorities there are for fighting fraud and the resources available to do so, the right culture to prevent, detect and deter fraud is fundamental to effective local action. A strong counter-fraud culture, with clear principles, standards and zero tolerance is the foundation of an effective response to fraud.
 - b) The 'tone from the top' is fundamental to establishing a robust and accepted counter-fraud culture. This helps to ensure that all staff are aware of counter-fraud arrangements, policies and procedures, and their responsibilities under such arrangements.
 - c) The Council's counter fraud policies and procedures are out of date and difficult to locate with a mixture of old and new policies and procedures available to staff. There is a lack of training in policies, procedures and processes leading to staff being unaware of the correct policies and procedures to follow.
 - d) Whistleblowing is a key component of managing the risk of fraud; therefore a robust and effective whistleblowing process is required to ensure people feel reassured to report suspected fraud, theft or corruption.
 - e) Minimising the impact of fraud starts with fit for purpose fraud risk management arrangements and good internal controls and governance. Fraud is mentioned as a risk on very few departmental risk registers, and a specific fraud risk register has not been developed. The latter would enable the Council to focus its attention to those most vulnerable areas and those at risk of fraud, especially the cross-cutting areas of the Council such as income, procurement, payroll, third party payments, etc. During the review Service Directors, Managers and Senior Officers highlighted some areas as vulnerable to the risk of fraud, theft and corruption within the Council.
 - f) The introduction of new organisational structures, changes in staff, and changes in internal control arrangements arising from the need to make savings has the potential to increase the risk of internal fraud. The Council should ensure that adequate and appropriate internal checks and controls have been maintained which are proportionate to the level of fraud risk, to ensure that assets are protected.
 - g) The Council is currently more reactive to fraud, rather than proactive. Positive results have been achieved from other areas of fraud investigation previously undertaken by the Benefits Fraud team on an ad-hoc and pilot basis as reported in previous Annual Fraud Reports, including Council Tax Single Persons' Discounts (£25.5k), Empty Property Discounts (£6.8k), and Non-Domestic Rates (£95k). With reducing resources more focus is needed on proactive prevention, detection and deterrence. Publicising measures to reduce fraud and the actions taken as a result of fraud investigations can also act as a deterrent. A Corporate Fraud resource within Audit & Risk could focus more effort on detecting fraud which directly affects revenue, to assess fraud risks effectively, and to target resource to produce the highest returns. A Corporate Fraud resource would assist the Council in protecting the public purse through sound procedures and controls in the prevention, detection and investigation of fraud, theft and corruption.

- h) With the introduction of the Single Fraud Investigation Service (SFIS) the Council's priority in tackling fraud will be affected. Benefit fraud is a substantial loss to the public purse, but it has less impact on the Council's budget. As SFIS will only investigate benefit fraud, the Council will have an opportunity to focus its counter-fraud investigation resources on other frauds, such as social care, council tax discounts, income, procurement, third party payments, etc., which do have a local impact and affect the availability of resources to deliver services.
- i) The CIPFA Counter Fraud Centre (CCFC) which launched in July 2014 will be a centre of excellence in counter fraud. It has developed a Code of Practice for Managing the Risk of Fraud and Corruption which was published in December 2014. The code is voluntary but, where organisations are required to report on the adequacy of their counter-fraud and anti-corruption arrangements as part of the annual governance statement, CIPFA expects that the principles would be used to support this assessment and conclusion. This code consists of four core principles that set out responsibilities for establishing good counter-fraud practice:
1. The governing body should acknowledge its responsibility for ensuring that the risks associated with fraud and corruption are managed effectively across all parts of the organisation.
 2. Fraud risk identification is essential to understand specific exposures to risk, changing patterns in fraud and corruption threats, and the potential consequences to the organisation and its service users.
 3. An organisation needs a counter-fraud strategy setting out its approach to managing its risks and defining responsibilities for action, and should make arrangements for appropriate resources to support the strategy.
 4. The organisation should put in place the policies and procedures to support the counter-fraud and corruption strategy and take action to prevent, detect and investigate fraud.
- j) Serious Organised Crime (SOC) risk can come from external individuals or organisations or from within the Council (corrupt or corruptible staff). The Council needs to have positive links within appropriate law enforcement bodies and other relevant partners, as a failure to consider the risk of SOC, especially when dealing with third parties, may result in financial or reputational loss, or exposure of staff to the threat of corruption or undue pressure or influence from these types of groups or individuals. A Serious Organised Crime Working Group has recently been established by the Council with an emphasis on joint working and data sharing to assist the Council and Police Scotland in diverting, deterring, disrupting and detecting fraud, theft and corruption as part of their arrangements for communicating and embedding the principles of the "Letting Our Communities Flourish" strategy.
- k) The National Fraud Initiative (NFI) in Scotland is well established and has been operating for over a decade. It remains the largest national fraud detection and prevention scheme that provides data matches between and within public bodies. Audit Scotland currently requires the Council to participate in a data matching exercise to assist in the prevention and detection of fraud. There were over 5000 cases identified for investigation for the Council in the 2013/14 exercise

which represents a significant task. The NFI exercise for 2014/15 is underway and the Council needs to ensure sufficient resources and capacity remains to progress and complete the NFI exercise.

- i) Management need to continuously monitor and review the internal control systems to ensure that fraud prevention and detection procedures are effective and robust, and that appropriate risk mitigating actions are in place.

4.4 The recommended improvement actions arising from the Counter Fraud Management Review 2014 which should ensure a proactive, holistic approach to dealing with fraud, theft and corruption are shown in the table below along with a statement on progress with their implementation. A clear message is to ensure that public funds are protected consistently to the highest standards.

	Recommendation	Action including status
a)	Policies, procedures, processes and guidelines should be updated to reflect the Council's approach to counter fraud, theft and corruption, including a review of roles and responsibilities regarding Fraud to ensure there is clarity and defined responsibilities.	A revised Corporate Counter Fraud Policy statement (Appendix 1) is ready for consideration & approval. A Corporate Fraud Working Group has been established, chaired by the Chief Officer Audit & Risk and supported by the new post Corporate Fraud & Compliance Officer, to review and update associated policies, procedures and guidelines across the Council.
b)	Awareness raising and training for counter fraud prevention and detection techniques should be given to staff.	An awareness programme will be developed once the policy framework has been refreshed.
c)	A Corporate Fraud team within Audit & Risk should be established to focus more effort on detecting fraud which directly affects revenue, to assess fraud risks effectively and to target resource to produce the highest returns.	A new post Corporate Fraud & Compliance Officer has been established within the Audit & Risk service. The postholder appointed on 1 June 2015 will lead on implementation of improvement actions.
d)	A risk assessment for fraud vulnerabilities should be undertaken. <ul style="list-style-type: none"> • A specific Fraud risk register should be developed for the Council that takes account of the highest fraud risk areas. • Fraud risk should be acknowledged in departmental risk registers where applicable. 	During the Counter Fraud Management Review some areas were highlighted by Management as potentially vulnerable to the risk of fraud, theft and corruption within the Council. This will be further developed to assess fraud risks and efficacy of internal controls, utilising the new risk management approach, which have been incorporated into the Counter Fraud Strategy (Appendix 2).

	Recommendation	Action including status
e)	A more proactive approach to fraud detection and investigation should be introduced as well as communications regarding successful / proven cases to assist with prevention and deterrence of fraud.	<p>National counter fraud strategies and standards will be implemented to assist in countering fraud, theft and corruption such as 'Protecting Public Resources in Scotland: The strategic approach of fighting fraud, bribery and corruption', 'Letting our Communities Flourish', and CIPFA's Code of Practice on 'Managing the Risk of Fraud and Corruption', with a focus on enhanced prevention and detection.</p> <p>These national strategies and standards have been incorporated into the Counter Fraud Strategy (Appendix 2).</p>
f)	There should be sharing of best practice and joint working in countering fraud with external organisations, partners and other local authorities.	<p>There is an ongoing commitment to participate in counter fraud forums at local and national levels.</p> <p>For example, the Chief Officer Audit & Risk is a member of the Cross Sector Counter Fraud Forum led by Scottish Government, one Senior Internal Auditor is a member of the NHS Borders Countering Fraud Operational Group, the Corporate Fraud & Compliance Officer is a member of the Scottish Local Authority Investigators Group, and the Council leads the Serious Organised Crime Working Group with Police Scotland involving officers from a variety of services.</p>

5 IMPLICATIONS

5.1 Financial

- (a) The Corporate Fraud resource within the Audit & Risk service will be accommodated within the revised budget after the reduction in the Housing Benefit Administration Subsidy received by the Council. The latter will be reduced by £51,711 in 2015/16 for the Council arising from the TUPE transfer of housing benefit fraud investigation responsibilities and 3.57 FTE staff resources to the Single Fraud Investigation Service (SFIS) within the Department for Work and Pensions (DWP) on 1 March 2015.
- (b) All other costs involved are contained within the central Corporate Fraud or departmental budgets. Any additional costs arising from enhanced counter fraud risk mitigation will have to be considered and prioritised against other pressures in the revenue budget.

5.2 Risk and Mitigations

- (a) Endorsing the recommended improvements to refine the counter fraud arrangements at the Council to ensure their ongoing effectiveness as outlined in this report, including the establishment of a corporate fraud resource within the Audit & Risk service, would provide the Council with an opportunity to demonstrate its commitment to minimising the risk of loss due to fraud, theft or corruption. This includes allocating sufficient resources proportionate to the level of fraud risk to ensure that income is maximised and assets are safeguarded.
- (b) Management need to continuously monitor and review the internal control systems to ensure that fraud prevention and detection procedures are effective and robust, and that risk mitigating actions are in place.

5.3 Equalities

An Equalities Impact Assessment (EIA) scoping assessment was carried out on 3 June 2015 and has been issued to the Corporate Equalities and Diversities Officer in accordance with current policy and practices. The outcome of the EIA is that it is anticipated there will be no adverse impact due to race, disability, gender, age, sexual orientation or religious/belief arising from the revised Corporate Counter Fraud Policy.

5.4 Acting Sustainably

There are no direct economic, social or environmental issues with this report.

5.5 Carbon Management

There are no direct carbon emissions impacts as a result of this report.

5.6 Rural Proofing

A Rural Proofing Checklist has been completed on 3 June 2015 in accordance with current Rural Proofing policy and practices. The outcome is that it is anticipated there will be no adverse impact on the rural area from the proposals contained in this report.

5.7 Changes to Scheme of Administration or Scheme of Delegation

No changes to the Scheme of Administration or Scheme of Delegation are required as a result of this report.

6 CONSULTATION

- 6.1 The Chief Executive, Depute Chief Executives, Service Directors and Service Managers have been consulted as part of the Counter Fraud Management Review
- 6.2 The Corporate Management Team has been consulted on this report, the revised counter fraud policy statement and the counter fraud strategy, and any comments received have been taken into account.
- 6.3 The Chief Financial Officer, the Monitoring Officer, the Chief Legal Officer, the Service Director Strategy and Policy, the Chief Officer HR, and the Clerk to the Council have been consulted on this report, the revised counter fraud policy statement and the counter fraud strategy, and any comments received have been incorporated into the report.

Approved by

Jill Stacey, Chief Officer Audit & Risk Signature

Author(s)

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Background Papers:

Previous Minute Reference:

Note – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Sue Holmes, Chief Executive’s Department, can also give information on other language translations as well as providing additional copies.

Contact us at Sue Holmes, Chief Executive’s Department Susan.Holmes@scotborders.gov.uk

COUNTER FRAUD POLICY STATEMENT

Introduction

The size and nature of the services provided by Scottish Borders Council (SBC), as with other large organisations, puts the Council at risk of loss due to fraud, theft or corruption. The aim of this policy is to communicate why effective and robust counter fraud arrangements should be in place to ensure the Council's ongoing resilience to the threats of fraud and corruption and a description of the approach that will be adopted by SBC to tackle fraud. This policy will be supported by the Counter Fraud Strategy, to ensure that SBC, nor its stakeholders, are exposed to an unknown, unmanaged or unacceptable degree of fraud risk by protecting themselves in an appropriate way.

Tackling fraud is an integral part of protecting public finances. The harm caused by fraud, however, is not just financial. Fraud damages local people and communities, damages the Council's reputation and undermines trust in public services. Every pound lost through fraud cannot be spent on providing and delivering quality services that people rely on and which they pay their taxes to get, therefore it is important to have a strong counter-fraud culture and effective counter-fraud measures embedded within its business processes and governance arrangements.

The changing and increasingly complex environment in which the Council operates, and the complexity of policies, procedures, processes, systems, customer interfaces, legislative requirements, partnerships and joint working arrangements and relationships with other organisations that enable the Council to deliver its services, is happening against a backdrop of depressed economic activity in which the fraud risk tends to increase.

Management are committed to minimising fraud risk and at the same time taking appropriate actions against those who attempt to defraud the Council, whether from within the authority or from outside. Refinements to the Council's approach to tackling fraud include a focus on enhanced fraud prevention and detection to improve its resilience to fraud.

Roles and responsibilities

The Council will continue to support its people to develop the appropriate skills and competencies so as to enable them to tackle fraud effectively and will recognise financial management as a core management competency.

Corporate Management Team (CMT)

CMT will act as counter fraud champions, tackling fraud from the top down, allocating sufficient resources proportionate to the level of fraud risk to ensure that income is maximised and assets are safeguarded, and fostering a strong counter fraud culture.

Audit & Risk Committee

The Audit & Risk Committee will oversee the adequacy and effectiveness of the Council's systems of internal financial control and framework of internal control to provide reasonable assurance of effective and efficient operations, including the review of assessment of fraud risks and the monitoring of the counter fraud strategy, actions and resources.

Senior Management

Senior management will: identify fraud and corruption risks; ensure that they understand and apply the counter fraud policy requirements within their own service provision procedures and practices to ensure a comprehensive and coherent approach to fraud prevention, detection and investigation; take action to prevent, detect and investigate fraud; periodically highlight to staff the importance of behaving with integrity; support internal and external audits; and carry out a periodic review of the efficacy of their counter fraud arrangements.

Chief Financial Officer

The Chief Financial Officer is designated by Council as the officer responsible for the administration of the Council's financial affairs in terms of Section 95 of the Local Government (Scotland) Act 1973.

Chief Officer Audit & Risk

The Chief Officer Audit & Risk will develop and maintain corporate counter fraud strategy, policy and procedures, in consultation with the Chief Financial Officer, and ensure these are communicated effectively throughout the Council and that processes are in place to embed this in the Council's culture and working practices.

Corporate Fraud & Compliance Officer

The Corporate Fraud & Compliance Officer will support the counter fraud management by: leading on the implementation of identified improvement actions; supporting the development and review of the counter fraud policy framework; monitoring that the fraud prevention, detection and investigation processes and procedures are followed; and offering advice, guidance, training and support.

Internal Audit

Internal Audit will review the effectiveness of controls put in place by Management to manage the risk of fraud. Full details of its roles are set out in the Internal Audit Charter.

Counter Fraud management process

Tackling fraud is not a one-off exercise; it is a continuous process across all parts of the Council because the service delivery processes it underpins are continuous. Tackling fraud is an integral part of good governance within the Council and demonstrates effective financial stewardship and strong public financial management.

Reporting

Reporting will include an annual report to CMT and the Audit & Risk Committee on the progress with implementation of counter fraud management improvement actions and outcomes, and the Annual Governance Statement to CMT and the Audit & Risk Committee which will include a statement on the efficacy of counter fraud arrangements.

Budget

All the costs involved are contained within the central Corporate Fraud Management or departmental budgets. Any additional costs arising from enhanced counter fraud risk mitigation will have to be considered and prioritised against other pressures in the revenue budget.

Quality Assurance

This policy will be subject to document control, version control, be reviewed at least annually, and be revised to reflect changes in legislation, counter fraud management best practice, and significant changes in corporate governance.

Review

Counter Fraud management policies and procedures will be reviewed on a regular basis to ensure their continued relevance and effectiveness.

SCOTTISH BORDERS COUNCIL

CORPORATE COUNTER FRAUD STRATEGY

The size and nature of the Council's services, as with other large organisations, puts the Council at risk of loss due to fraud, theft or corruption. Management are committed to minimising this risk and at the same time taking appropriate action against those who attempt to defraud the Council, whether from within the authority or from outside. Refinements to the Council's approach to tackling fraud include a focus on enhanced fraud prevention and detection to improve its resilience to the threat of fraud and corruption.

The Council's strategy, which is based upon the national counter fraud standard CIPFA's Code of Practice on 'Managing the Risk of Fraud and Corruption' published in December 2014, is built around the following:

Counter fraud and corruption culture

The Council expects its employees and elected members to act within the law and the high standards of integrity, honesty and openness, which are reflected in the Council's internal codes, rules and procedures. The Council also expects that all outside individuals and organisations, including service users, partners, suppliers, and contractors will act to the same standards.

Plans and policies

Service specific plans, policies, procedures, processes and guidelines contain more detailed information on how to deal with fraud, theft or corruption as part of their service provision to ensure that income is maximised and assets are safeguarded.

A Corporate Fraud Working Group has been established, chaired by the Chief Officer Audit & Risk and supported by the new Corporate Fraud & Compliance Officer post, to review and update associated policies, procedures and guidelines across the Council. As a minimum the policy framework will include: Counter Fraud Policy; Whistleblowing Policy; Anti Money Laundering Policy; Anti-Bribery & Corruption Policy; Gifts & Hospitality Policy and register; Conflict of Interest Policy and register; Codes of Conduct and Ethics; Information Security Policy; and Cyber Security Policy.

Deter and detect

The Council will focus on enhanced fraud prevention and detection in accordance with the cross sector counter fraud strategy 'Protecting Public Resources in Scotland: The strategic approach of fighting fraud, bribery and corruption' launched in June 2015.

Management will continuously monitor and review the internal control systems which include financial regulations, scheme of delegation, standing orders, data security, codes of conduct, protocols, practices and guidelines, to ensure that fraud prevention and detection procedures are effective and robust, and that risk mitigating actions are in place.

In addition Management will continue to identify those areas, existing or new, susceptible to fraud, theft or corruption, including those highlighted through the Counter Fraud Management Review (2014), and implement controls to manage the risk, utilising the new risk management approach to assess fraud risks and the efficacy of internal controls.

A more proactive approach to fraud detection will be introduced, including enhanced use of techniques such as data matching and intelligence sharing. Positive publicity about the successful detection or prevention of a fraud will play a key part in deterring others.

The Council will continue to work with other organisations to manage its fraud risks and share best practice through participation in counter fraud forums at local and national levels. There will be further joint working in countering fraud in particular in response to the risks from organised crime which can commit fraud across the public sector, embedding the principles of the “Letting Our Communities Flourish” strategy. The Council will continue to participate in the National Fraud Initiative in Scotland as active detection and prosecution of fraudsters is a vital deterrent to others contemplating defrauding the public purse.

Training and awareness

To have effective counter fraud, theft or corruption controls the Council recognises that it must provide awareness and training programmes for counter fraud prevention and detection techniques.

In its communications with employees and elected members the Council will incorporate the key message that internal control systems to counter fraud, theft or corruption are designed both to safeguard assets and to protect their integrity if challenged.

In the Council’s dealings with outside individuals and organisations it will ensure that they are aware of the Council’s stance towards tackling fraud, theft or corruption. The Council will encourage the reporting of suspected fraud, theft or corruption through confidential reporting or whistleblowing arrangements to the Counter Fraud team and reassure those who fear reprisals that it will protect their rights.

A further awareness programme will be developed and implemented by the Corporate Fraud & Compliance Officer once the policy framework has been refreshed.

Action

Service Directors and Managers will report all actual or suspected cases of fraud, theft or corruption to the Chief Officer Audit & Risk and initiate an investigation the aim of which is to take corrective action, minimise losses and help prevent further frauds. Where initial investigations identify evidence of criminality, the matter will be reported to the Police.

Where investigations reveal evidence of fraudulent or dishonest behaviour, corrupt practice or theft, appropriate steps will be taken including disciplinary action in accordance with the HR policies and procedures if the persons are members of staff or legal action if the persons are external to the Council.

Steps will also be taken to recover losses resulting from fraud, theft or corruption including the recovery of assets and money, which may involve joint working with public sector partners.

Monitoring and Review

Internal Audit will continue to review the efficacy of counter fraud internal controls put in place by Management and provide independent assurance over fraud risk management, strategy and activities.

The Audit & Risk Committee will oversee the adequacy and effectiveness of the Council’s systems of internal financial control and framework of internal control through scrutiny of regular reports on the assessment of fraud risks and the monitoring of the counter fraud strategy, actions and resources.