

ACTION PLAN

ANNEX B

Ref	Task	Code	Action	Outcome	Performance Measure
1.	Benchmark the current arrangements against the Code of Practice and establish an action plan to take fraud forward proactively.	-	Review service Owner: Head of Internal Audit Timeline: March 2016	-	-
2.	Establish Fraud and Corruption Strategy to deliver on fraud agenda over 3 years	A, B, C, D, E	Owner: Head of Internal Audit Timeline: March 2016	-	-
3.	Identify clear roles and responsibilities across the Council, including the establishment of a member champion	A	Incorporate into terms of reference of Civic Affairs Committee that Chair is the risk Champion OR factored in to role of Executive Councillor. Discussions to be held with Legal Services post elections. Owner: Head of Internal Audit Timeline: May 2016	Established champion	-
4.	The content relating to fraud on both "InSite" and the external webpage to be updated.	A, B, C, D	Both intranet / external websites will be brought into line with the Strategy and will clearly state the Councils zero tolerance approach to fraud, as well as providing links to the range of counter fraud policies and procedures that are available, including safe reporting routes, such as the single fraud hotline and a dedicated website. Owner: Head of Internal Audit / Fraud Manager Timeline: September 2016	A user friendly website, which in addition to listing CCC policies, clearly and concisely promotes zero tolerance culture and the duty to report suspicions	Analysis of website content in conjunction with best practice, and an increase in successful referrals
5.	Employee / Member training and awareness sessions to be provided	A, C, D	As all CCC staff and members play a role in the delivery of the Strategy, the training provided will signpost information relating to fraud, the Councils zero tolerance culture, and the duty to report any reasonable suspicions in accordance with procedures outlined in the Council's Whistleblowing Policy. The Counter fraud training will be promoted throughout the organisation. Owner: Head of Internal Audit / Fraud Manager / Human Resources Timeline: September 2016	Staff awareness of fraud risks, key aspects of policy, and the appropriate procedures to follow	Comprehension of policy, assisted by the mandatory undertaking of the fraud awareness module

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6.	A fraud awareness induction for all new employees and all recently elected members to be provided	A, C, D	<p>Link with 5 above, fraud awareness will be provided during the induction session for new employees, and Member Development. Using the strategy as a focal point, the content will raise awareness of the standards of conduct expected, the need to make an appropriate disclosure of interests, gifts and hospitality, the appropriate means to report suspicion of misconduct, and where to seek further advice</p> <p>Owner: Head of Internal Audit / Fraud Manager / Human Resources Timeline: September 2016</p>	All new staff will be aware of the zero tolerance approach to Fraud, as well as how to report suspicions	Feedback sessions and questionnaires at the end of each counter fraud induction session
7.	Appropriate guidance on publicising counter fraud incidents to be developed	E	<p>In order to improve the methods through which the Council raise awareness of what constitutes fraud and the means to report fraudulent acts, the way that counter fraud guidance is delivered will be examined. As part of this process, the issues surrounding the publication of internal and external frauds will be brought before both senior management and members for consideration, and once agreed, the guidance will be disseminated as widely as appropriate</p> <p>Owner: Head of Internal Audit / Fraud Manager Timeline: September 2016</p>	<p>A clear programme of counter fraud publications, endorsed by the communications team</p> <p>Annual report to committee</p> <p>Improved web pages</p>	Assessing the use of publications by comparing current and previous tip offs, detection rates etc., will give an indication as to how effective such campaigns are in reducing the extent of fraud
8.	<p>Review Anti-fraud and corruption policy; Fraud response plan and Protocols with external partners.</p> <p>Establishment of a Cyber Security policy</p>	A, B, C, D, E	<p>Clear up to date policies in place which meets current expectations</p> <p>Owner: Head of Internal Audit / Fraud Manager Timeline: November 2016</p>	Best practice adopted	
9.	Understand the fraud risks which could impact on Council	A, B, C, D, E	<p>Review existing risk management / risk registers to reflect on considerations of fraud risk.</p> <p>Owner: Head of Internal Audit Timeline: September 2016</p>	Greater appreciation of fraud risks across departments	
10.	Practical, proactive works introduced to reduce the potential risk levels	C	<p>Development of the use of data matching arrangements within Internal Audit making use of IDEA software</p> <p>Owner: Head of Internal Audit Timeline: September 2016</p>	Fraud risks mitigated	