Anti-Fraud, Bribery and Corruption Plan 2012/13   Appendix B

AREA	PRODUCT	OUTCOME	ACTIONS	ACTIONED/ EXPECTED DELIVERY DATE
Organisational Culture	Revised Policies	Clear links between the policy and operational work.	• Revise Anti Fraud and Corruption Policy to incorporate any changes in appropriate legislation and drafted to policy hub format. • Revise Whistle blowing Policy to incorporate changes in FOI and drafted to policy hub format. • Revise Gifts and Hospitality Policy to incorporate Bribery Act 2010 requirements and drafted to policy hub format. • Revise Anti-Money Laundering Policy and procedures and drafted to policy hub format.	Revised action by March 2014 Actioned November 2012 Revised March 2014 Revised March 2014
	Revised Strategy	Clear identification of potential gaps in the delivery of Corporate counter fraud and their potential impact on the Authority.	• Revise Corporate Counter Fraud Strategy in line with recommended best practice.	Revised June 2014
	Revised Response Plan for Internal Abuse	Proactive, appropriate and consistent action taken is when suspected fraud, corruption or dishonest dealings are identified that relate to internal parties	• Identify changes in legislation and areas of best practice. i.e. Bribery Act 2010, RIPA, HR Act, DPA, PACE and PEACE	**On-going** Changes in RIPA 1st November 2012
	Awareness Training	Staff and Members are aware of the impact of fraud, bribery, corruption and dishonesty and what actions they should take and when. Mandatory training is provided on induction for new members and staff. Annual training is provided for all current staff and	• Revise current anti-fraud training content covering all general topics relating to fraud, corruption and dishonest actions for topical relevance and inclusion of bribery. • Identify specific target groups requiring in-depth training • Draft anti-money laundering training • Identify staff requiring specific anti-	**Revision actioned December 2011 annual revision required, due June 2014** **Actioned December 2011 actual training to be determined June 2014**

AREA	PRODUCT	OUTCOME	ACTIONS	ACTIONED/ EXPECTED DELIVERY DATE
		members.	money laundering training	Revised action date March 2014
	Revised Fraud risk Questionnaire. Bribery risk assessment methodology devised.	Fraud and Bribery risks are fully understood and mitigated as far as possible to reduce the likelihood of materialisation.	• Identify areas of best practice and high-risk areas for both fraud and bribery. • Establish and document individual risks associated with potential fraudulent activities covering both internal and external abuse for inclusion in the service risk registers and corporate registers. • Develop risk assessment methodology for bribery risks.	**Actioned June 2011** Revision required June 2014 **Actioned June 2011, revision required, due** March 2014
	Regular publicity on fraud, corruption and dishonesty.	Raising the profile and awareness of fraudulent activities, Council action and outcomes. Reduce likelihood of fraud, bribery, corruption and dishonesty	• Regular publications on Intralink. • Determine alternative methods of publication.	**On-going Actioned March 2012 costing and publication consideration due** March 2014. Communications to be revisited in August 2014
Preventative and Detective Measures	Supporting Policies in place linked to Anti-Fraud, Bribery and Corruption Policy	Clear links between relevant policies that support the culture and tolerance of fraud, corruption and dishonest activities within and against the Council.	• Revise all relevant policies and procedures applicable.	**On-going**
	Vetting of staff, contractors	Honest staff are employed from	• Identify best practice in relation to	**On-going**

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	and partners.	the outset. PCC only undertake business with parties that hold the same ethical standards that PCC hold.	• Identify appropriate agreement framework for partners. • Incorporation of Bribery Act 2010 requirements	Revised date June 2014 (specifically bribery requirements)
	Investigation Procedures	All investigations are performed consistently and in accordance with laws and legislation	• Identify relevant changes in legislation and best practice incorporate in current procedures manual.	**On-going**
Training	Skilled and training members of staff to undertake investigations.	All investigations are carried out to a prescribed standard in accordance with law and legislation. Successful prosecution/ sanction rate increased.	• Identified officers to undertake training CCIP • Officers trained	**Actioned December 2011 Financial Investigator training completed September 2013**
Sanctions, redress and Recovery	Citywide sanction policy in place.	Clear sanction options are identified and carried out consistently across the Council	• Identify options available and legal implications and impact	Revised date September 2014 **SI's reported to G&A annually each case dealt with on merit**
	Recovery Policy	Clear recovery options identified including under 'proceeds of crime', freeze injunctions and seizures.	• Identify options available and legal implications and impact	Revised date September 2014
Measuring Losses	Register of losses	The Council are able to identify the actual losses incurred and direct resources accordingly at high risk areas.	• Identify all relevant areas applicable and data required • Establish central register and reporting mechanism	**Central register held by Internal Audit. Losses not always able to be determined**
Measuring Performance	Data Matching and NFI	Collation, sharing and analysis of intelligence gathered for internal and external incidents	• Complete current data matching results in timescale determined by Audit Commission.	**On-going**

AREA	PRODUCT	OUTCOME	ACTIONS	ACTIONED/ EXPECTED DELIVERY DATE
			• Attendance of Hampshire Alliance group sharing of intelligence • Identify areas not currently covered by NFI and risk assess before considering inclusion in future matching	**On-going**

Elizabeth Goodwin
Deputy Chief Internal Auditor
17th December 2013