

AREA	PRODUCT	OUTCOME	ACTIONS	ACTIONED/ DELIVERY DATE
Organisational Culture	Revised Policies	Clear links between the policy and operational work.	<ul style="list-style-type: none"> • 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. 	<p>Actioned September 2014</p> <p>Actioned September 2014</p> <p>Actioned October 2014</p> <p>Action Required December 2014</p>
	Revised Strategy	Clear identification of potential gaps in the delivery of Corporate counter fraud and their potential impact on the Authority.	<ul style="list-style-type: none"> • Revise Corporate Counter Fraud Strategy in line with recommended best practice. 	Action required December 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	<ul style="list-style-type: none"> • 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 1 st November 2012
	Awareness Training	<p>Staff and Members are aware of the impact of fraud, bribery, corruption and dishonesty and what actions they should take and when.</p> <p>Mandatory training is provided on induction for new members and staff. Annual training is provided for all current staff and members.</p>	<ul style="list-style-type: none"> • 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-money laundering training 	Action required by March 2015.

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	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.	<ul style="list-style-type: none"> 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. 	Action required March 2015
	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	<ul style="list-style-type: none"> Regular publications on Intralink. Determine alternative methods of publication. 	Action required March 2015
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.	<ul style="list-style-type: none"> Revise all relevant policies and procedures applicable. 	On-going
	Vetting of staff, contractors and partners.	Honest staff are employed from the outset. PCC only undertake business with parties that hold the same ethical standards that PCC hold.	<ul style="list-style-type: none"> Identify best practice in relation to staffing checks. Identify appropriate agreement framework for partners. Incorporation of Bribery Act 2010 requirements 	On-going
	Investigation Procedures	All investigations are performed	<ul style="list-style-type: none"> Identify relevant changes in 	Actioned October

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		consistently and in accordance with laws and legislation	legislation and best practice incorporate in current procedures manual.	2014
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.	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Identify options available and legal implications and impact 	Action Required March 2015 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.	<ul style="list-style-type: none"> Identify options available and legal implications and impact 	Action Required March 2015
Measuring Losses	Register of losses	The Council are able to identify the actual losses incurred and direct resources accordingly at high risk areas.	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Complete current data matching results in timescale determined by Audit Commission. 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 On-going