

Appendix C

EHC / SAFS Action Plan 2019/2020

CIPFA Principles	Goals & 6Cs	Activities	Responsible Officer	Progress to March 2020	
ACKNOWLEDGE	Fraud is acknowledged as a Risk for the Council CULTURE	The Council has in place Anti-Fraud and Corruption Strategy & Fraud Response Plan	Chief Executive / Monitoring Officer	Review conducted in early 2020 for publication later this year. This will include the latest guidance and best practice.	
		Inclusion of Fraud Risks and the Councils actions to manage/mitigate/reduce this in its Annual Governance Statement. Review the Councils Money Laundering/ Bribery/ Whistleblowing/ Cyber-Crime Policies	S. 151 Officer/ Monitoring Officer	Review partially completed - see above.	
		PAGO Committee and Senior Managers ensure compliance with CIPFA best practice in their counter fraud arrangements	S. 151 Officer	Policy review and new training plan with HR, resources dedicated to counter fraud activity.	
		The Council will make it clear through its policies and codes of conduct for staff and Members that fraud and corruption will not be tolerated.	Head of Legal/ Head of Human Resources	Officers are working to embed trainin and policies and shae these via the Intraet and other means to all staff	
	The Council has a robust communication policy demonstrating its commitment to prevent fraud COMMUNICATION	The Councils Communication Team will publicise prosecutions, anti-fraud campaigns and provide internal communications to staff on fraud awareness	Senior Communications Officer	SAFS and EHC Comms publicise AF activity and campaigns	
		Access to SAFS fraud reporting tools (web/phone/email) for staff, public and elected Members.	SAFS Manager / Senior Communications Officer	All in place and made available to EHC staff and residents	
		The Council and SAFS will provide fraud awareness or specific anti-fraud training across all Council services and review the E-Learning Training for staff	SAFS Manager & Head of Human Resources	Fraud awareness programme delivered with HR and supprt from service managers	
		SAFS will provide fraud alerts to appropriate officers/staff/services from Action Fraud/ NAFN/ Police .	SAFS Manager	24. Alerts issued from SAFS Intel to SAFS Partners.	
	PREVENT	Co-ordination of effort, sharing of best practice, data, fraud alerts and new threats. COLLABORATION	Implement the contract for EHC to join the Herts <i>FraudHub</i> in 2019.	SAFS Manager/ s.151 Officer	Contracts were approved in early 2020 but due to Covid this has been delayed and no further action at present.
			Review data sharing agreements/protocols to ensure compliance with DEA & GDPR/DEA	Monitoring Officer / SAFS Manager	Complete and in place
Deliver the NFI2018/19 Exercise			SAFS Manager/ s.151 Officer	1447 matches in all received by EHC . All high risk matches cleared.	
Work with DWP to deliver CTRS/HB joint working 2018 roll-out			SAFS Manager/ Head of Shared R&B Service	JW in place with DWP/FES at Stevenage on relevant cases	
Work with other organisations, including private sector, to improve access to data			SAFS Manager	SAS Project in place (HCC). Destin Solutions SBRR scheme offered to EHC R&B.	
Have the highest levels of professional standards COMPETENCE		All SAFS staff will be fully trained and accredited	SAFS Manager	SAFS All trained and accredited.	
		All investigations will comply with relevant legislation and Council Policies	SAFS Manager	SAFS Mgt monitor all live cases to comply	
		SAFS will work with the LGA and Cabinet Office to support the roll out of a Counter-Fraud Profession	SAFS Manager	SAFS are part of a Collective Application to join Profession by March 2020 (now delayed to late 2020)	
		SAFS will work with Council Services to make best use of 3rd party providers such as NAFN, PNLD, CIPFA	s.151 Officer/ SAFS Manager	All complete and licenses in place	
		PURSUE	Ensuring the Counter-Fraud Measures are appropriate to the range of fraud risk. CAPABILITY	SAFS will provide reports to Board and SAFS Champions quarterly on anti-fraud activity at the Council	SAFS Manager/ s.151 Officer
SAFS will record and report on all fraud referred, investigated and identified	SAFS Manager			All Cases are recorded on SAFS Case Management System	
SAFS will review fraud trends and new threats and report on these to Council officers	SAFS Manager			Ongoing as part of the CMS	
SAFS and the Councils Legal and Debt teams will seek to 'prosecute' offenders and recover losses	SAFS Manager /Monitoring Officer/ s.151 Officer/ Head of Shared R&B Service			SAFS has worked with the Councils legal team and other third parties to bring cases to court	
Develop the right level of resources to deal with the level of fraud risk CAPACITY	The Council will review its ROI from SAFS Membership		s.151 Officer	s.151 Receives update and reports as required.	
	SAFS will assist the Council in providing its Transparency Code (Fraud) Data annually		SAFS Manager	All 2018/19 data was published in July 2019	
	Reports for PAGO Committee on all Counter Fraud activity		SAFS Manager / s.151 Officer	PAGO rec'd reports in Sep 2019/ Jan 2020 the March 2020 delayed to May.	
	SAFS will work with bodies including MHCLG/LGA/CIPFA/FFLB to develop anti-fraud strategies at a national level that support fraud prevention in local government		SAFS Manager	SAFS is part of the Fighting Fraud Locally Working Group to develop a national strategy for local government from 2020	