

APPENDIX 1 – Action Plan – Review of Anti-Fraud and Corruption Arrangements

Action Reference	Action Required	Responsibility	Action Date
1	Obtain the input of Corporate Audit Committee in relation to the maintenance of : 1) Anti-fraud & Corruption Policy, 2) Whistleblowing Policy, 3) Fraud Response Plan 4) Anti-Money Laundering Policy.	Group Manager (Audit & Risk)	6/12/11
2	Build upon information / guidance available through the intranet (New Starter Induction webpages) related to Council rules and regulations by considering the use of the Corporate Induction one day course.	Group Manager (Audit & Risk)	31/03/2012
3	Continue to use the Fraud Bulletins to raise / maintain awareness of fraud risks. Refer to relevant Council rules, regulations, policies, procedures.	Group Manager (Audit & Risk)	Ongoing - Quarterly
4	Revise and update the Council's Whistleblowing Poster and arrange for copies to be prominently displayed in all appropriate Council premises.	Group Manager (Audit & Risk)	31/03/2012
5	Audit & Risk Team to consult with Divisional Directors and Managers to identify all Council activities / functions for audit planning purposes. This should enable all activities / functions to be assessed in terms of potential financial irregularity risk to enable Anti-Fraud and corruption work to be scheduled / agreed and a full risk assessment to take place.	Group Manager (Audit & Risk)	31/03/2012

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6	Audit & Risk to continue to co-ordinate the Council's response to the National Fraud Initiative and monitor the outcomes. If any serious control breakdowns are identified these should be resolved by liaising with the relevant Council Service.	Group Manager (Audit & Risk)	Ongoing
7	Based on the creation of the Social Enterprise (Sirona) and the proposed changes to the NHS the Audit & Risk Team will liaise with the NHS Counter Fraud Team to consider changes to the existing joint working protocol.	Group Manager (Audit & Risk) NHS Counter Fraud Team	31/03/2012
8	The current annual survey of 1 st to 3 rd tier officers on Organisational Values is continued.	Head of Risk & Assurance	30/07/2012
9	Work with Communications and Marketing to consider the development of the Staff Survey to monitor the anti-fraud / corruption culture of the Council.	Group Manager (Audit & Risk)	31/12/2012
10	Review counter fraud arrangements in context of the National Fraud Authority Strategy for Local Government, Fighting Fraud Locally (to be published shortly).	Group Manager (Audit & Risk)	31/03/2012
11	Review whistleblowing arrangement for residents and visitors to the area.	Group Manager (Audit & Risk)	31/03/2012

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12	Develop a 'database' of actual or attempted frauds scams (financial irregularities) so assurance can be provided that systems of control in relation to these irregularities have been tested and assessed as robust as at a point of time.	Group Manager (Audit & Risk)	31/03/2012
13	Consider the British Standard Institutes new standard BS10500 designed to verify both internally and to external stakeholders that robust anti-bribery practices are in place and operating. Take any action as necessary.	Group Manager	31/03/2012