

Internal Audit & Counter Fraud Shared Service  
Medway Council & Gravesham Borough Council

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# Counter Fraud Plan 2023-24

Gravesham Borough Council

# I. Introduction

The Internal Audit & Counter Fraud Shared Service was established on 1 March 2016 to provide internal audit, counter fraud and investigation services to Medway Council and Gravesham Borough Council.

Section 151 of the Local Government Act 1972 places a duty on the council to 'make arrangements for the proper administration of their financial affairs'. The prevention, detection and investigation of fraud supports these arrangements by taking steps to ensure that public funds are spent correctly, and that redress is sought in cases of identified fraud.

The Counter Fraud Plan is supported by the Strategy for the Internal Audit & Counter Fraud Shared Service which sets out the key objectives for the development of the team.

# II. Resourcing

The Counter Fraud Plan will be delivered using the in-house resources within the Shared Service, a total of 5.21FTE comprising of 0.35FTE Head of Internal Audit & Counter Fraud, 1FTE Counter Fraud Manager, 2FTE Counter Fraud Officers, and 1.86FTE Counter Fraud Intelligence Analysts (0.14FTE currently vacant). All available chargeable days for these staff are allocated on the plan; resources spent on strategic leadership and management provided by the Head of Internal Audit & Counter Fraud and the Counter Fraud Manager are not allocated on the plan.

The total chargeable Counter Fraud resource available for 2023-24 for Gravesham is 244 days;

# III. 2023-24 Counter Fraud Plan

The Plan is intended to provide a clear picture of how the council intends to use the Counter Fraud team within the Shared Service, reflecting all areas of work that the team may be involved in for Gravesham during the financial year.

The plan includes, activity linked to fraud awareness and prevention, proactive counter fraud work activity, and responsive investigation, as well as time to provide the Single Point of Contact (SPOC) role for the DWP Fraud and Error Service for their investigation of Housing Benefits administered by the council.

It should be noted that some of the activity is aspirational and dependent on the resource available as the investigation of suspected fraud must take priority where appropriate. For example, if the data matching activity linked to the National Fraud Initiative and Kent Intelligence Network creates a significant volume of cases to be investigated, it may not be appropriate to undertake further pro-active exercises.

## Fraud Awareness & Prevention

Ref	Activity	Scope of work
1	Fraud Risk Assessments	<p>Continue to undertake assessments of fraud risks and controls within key areas of the council, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Housing (Waiting list, tenancy fraud),</li> <li>• Human Resources (false identity, flexitime, recruitment, sickness),</li> <li>• Payroll (expenses claims, overtime),</li> <li>• Procurement,</li> <li>• Revenues and Benefits (Housing Benefit, Council Tax Reduction, Council Tax Discounts &amp; Exemptions, Business Rates),</li> <li>• Car Parking.</li> </ul> <p>Also undertake an assessment of the council's overall response to fraud and identify any areas for improvement.</p>
2	Fraud Awareness	Deliver awareness sessions and training to a range of staff and Members to increase knowledge of fraud risks, their role in prevention activity and the processes to refer suspicions to the counter fraud team.
3	Corporate Working Groups	Attend Corporate Working Group meetings and Project Boards to offer advice on fraud risks and prevention.

## Pro-Active Counter Fraud Activity

Ref	Activity	Scope of work
4	National Fraud Initiative	Coordinate the Council's participation in National Fraud Initiative Exercises, including submission of relevant data sets and assessment of referrals received.
5	Kent Intelligence Network	Actively participate in the activities of the Kent Intelligence Network and it's data matching proposals to further increase the detection of potential fraud and error.
6	Pro-Active Exercises	Undertake pro-active activity designed to identify potential fraud and error.

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## Responsive Investigation Activity

Ref	Activity	Scope of work
7	Responsive investigation work (external)	Conduct investigations into referrals of suspected fraud committed against the council by external sources.
8	Responsive investigation work (Internal)	Conduct investigations into suspected fraud or malpractice and assist with disciplinary investigations as required.

## Other Counter Fraud Activity

Ref	Activity	Scope of work
9	Liaison with the DWP	Provide the Single Point of Contact (SPOC) role for the DWP FES for their investigation of Housing Benefits administered by the council.
10	Responding to information requests	Respond to information requests from the Police, local authorities and other investigatory bodies under exemptions in the Data Protection Act/General Data Protection Regulations.
11	Partnership Liaison	Actively participate in meetings with partner organisations, such as the Kent Investigation Officers Group (KIOG), Serious & Organised Crime Partnership (SOCP) and Kent & Medway Fraud Panel.

## IV. Performance Monitoring

Arrangements to monitor the activities of the team and progress against the Plan are built into the working processes of the team and will be reported to senior management and the Finance & Audit Committee. These progress updates will also include the suite of performance Indicators in the table below.

Due to the responsive nature of much of the counter fraud activity, targets cannot be set for many of the indicators but outputs will be provided to Members to demonstrate the effectiveness of the Service.

Ref	Indicator	Target	Frequency
<b>Non LA Specific Performance Measurements</b>			
CF1	Proportion of staff with professional qualification relevant to counter fraud	N/A	Annually
CF2	Proportion of non-qualified staff undertaking professional qualification training	N/A	Annually
CF3	Time spent on Professional qualification training:	N/A	Quarterly
CF4	Time spent on CPD/non-professional qualification training, learning & development	25 days	Quarterly
<b>LA Specific Performance Measurements</b>			
CF5	Proportion of available resources spent on chargeable work	N/A	Quarterly
CF6	Proportion of chargeable time spent on: <ul style="list-style-type: none"> <li>a) Fraud Awareness &amp; Prevention</li> <li>b) Pro-Active Counter Fraud Activity</li> <li>c) Responsive Investigation Activity</li> <li>d) Other Counter Fraud Activity</li> </ul>	N/A	Quarterly
CF7	Number of investigations concluded	N/A	Quarterly
CF8	Value of fraud losses identified: <ul style="list-style-type: none"> <li>a) cashable (losses that can be recovered)</li> <li>b) non-cashable (notional savings based on national estimates)</li> <li>c) Prevented Losses (Savings associated with blocked applications)</li> </ul>	N/A	Quarterly
CF9	Number of civil actions resulting from investigative activity <ul style="list-style-type: none"> <li>a) Civil penalties for negligence</li> <li>b) Right to Buys cancelled</li> <li>c) Council Properties recovered</li> </ul>	N/A	Quarterly

CF10	Number of criminal sanctions applied a) Cautions b) Administrative Penalties c) Prosecutions	N/A	Quarterly
CF11	Client, Management and Member satisfaction with Counter Fraud services	90%	Annually