

## Appendix 2: Counter Fraud & Investigation Thurrock Council Work Programme 2014/15

Work Stream	Priority	Activities	Current Status 20 February 2015
<b>Overall Arrangements (Fighting Fraud Locally)</b>			
Policies	High	Refresh the Anti Fraud & Corruption Policy taking into account the new working arrangements and national guidance.	The Group Counter Fraud & Investigations Manager has commenced the review of the policies against current case law and the proposed new guidance from CIPFA. New draft policies will be produced by June 2015
		Refresh the Money Laundering Policy taking into account the new guidance.	
		Check for consistency, any references to these policies within Contract Procedure Rules, Financial Regulations or other elements of the Constitution.	
		Produce a communication strategy regarding all policies for staff, members and schools and implement it.	Group Counter Fraud & Investigations Manager. 2015/16
Awareness Raising Material	High	Update the posters and leaflets to reflect the new operating arrangements and distribute as required.	Group Counter Fraud & Investigations Manager. June 2015
Bribery Act & Money Laundering	High	Evaluate the new CIPFA Money Laundering Guidance when published in February 2015.	Group Counter Fraud & Investigations Manager. June 2015
		Update the risk assessment survey if necessary.	

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		Distribute to Group Managers, collate the results and identify current, potential risk areas.	Group Counter Fraud & Investigations Manager. June 2015
		Deliver targeted training to those services who have a high exposure to those risks.	Group Counter Fraud & Investigations Manager. September 2015
Thurrock Council: Internal Operating Arrangements	High	Evaluate the effectiveness of the CF&I teams operating arrangements with: <ul style="list-style-type: none"> <li>• Legal Services</li> <li>• Revenues</li> <li>• Community Protection.</li> </ul>	The Service Level Agreement with Southend Council was signed on 1 October 2014, for a period of three years.  This work will be undertaken over the next six months.
		Align the working policies for a shared Prosecution Manual that takes into consideration the improved ability to take criminal redress under the Proceeds of Crime Act that will also be accessed by Trading Standards, Revenues & Benefits services.	
<b>Planned Proactive and Fraud Awareness Exercises</b>			
Procurement / Contracts Letting and Management	High	Undertake further enquires where there are indications that purchases / contracts let have not fully complied with the Council's Contract Procedure Rules.	A procurement specialist has been engaged by the service at one of its partner's who will be consulting to Thurrock Council's Fraud Service as part of that piece of work. The potential implications for developing proactive fraud work in this area will now be considered.
Housing	High	Undertake a data	A broader programme of work has

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Tenancy		matching exercise with data aggregator provider.	been devised for completion by 1 June 2015 on social housing tenancy fraud, in conjunction with other relevant organisations including South Essex Homes.
Housing Benefit	Medium	Explore possibilities to develop in house data matching routines.	This work has been linked to the Council's participation in the National Fraud Initiative.
		Undertake targeted exercises if themes arise via investigations being undertaken.	The team are continuing a proactive exercise with the Department of Works & Pensions using 'Real Time Information' from HM Revenues and Customs.
Payroll	Medium	Confirm that appropriate pre-employment checks have been completed.	The service will be engaging with Human Resources to 'dip-sample' a random 30 files to check compliance with the vetting and recruitment processes.  It is anticipated that this will be complete by June 2015.
		Check national insurance numbers for relevant new appointments to confirm they have the right to work in the UK.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise.
Blue Badge	Medium	Undertake data matching to identify blue badge holders who have died but their badges have not been returned.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise below.
		A periodic exercises to check the validity of Blue Badges being displayed is being devised jointly with Social care and Parking Enforcement.	An operation in this area has been designed to commence by July 2015, using national best practice targeting specific criminality in the system i.e. fraudulent applications, counterfeit badges, stolen badges etc.

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Council Tax Discount & Exemptions	High	Undertake a data matching exercise with Revenues on Single Person Discounts.	Refer to section on the Audit Commission's National Fraud Initiative (NFI) exercise.
Business Rates	Medium	Conduct a review of all exemptions in place across the borough by category to produce a list to check against data sources such as Charity Commission for those businesses claiming charity status etc.	<p>The threat assessment in this area is being analysed against national best practice, including the use of proactive data matching tools to identify potential issues.</p> <p>This area will be included in the proof of concept stage detailed in the Counter Fraud Fund project (Appendix 1).</p>
Right to Buy	Medium	Continue to work with the Housing team to check the validity of Right to Buy applications when initial request is made.	<p>The team continue to investigate concerns re individual applications as and when they are referred to them.</p> <p>The new Proactive Investigation Specialist will be reviewing the assessment and referral practice against national best practice, jointly with the Group Counter Fraud &amp; Investigation Manager.</p>
<b>Other Data Matching Exercises</b>			
National Fraud Initiative	High	Investigate high level recommended data matches in the 2015 exercise.	The team have already began working with Internal Audit in processing these high risk matches.