

**PROTECTING THE PUBLIC PURSE 2011 – CHECKLIST FOR THOSE  
RESPONSIBLE FOR GOVERNANCE**

		Yes	No	Comments
<b>General</b>				
1.	Do we have a zero tolerance policy towards fraud?	√		The authority has a zero tolerance to Fraud, this is demonstrated in the policies detailed below.
2.	Do we have the right approach, and effective counter-fraud strategies policies and plans? Have we aligned our strategy with 'Fighting Fraud Locally'	√		There is a range of polices in place; Anti Fraud and Anti Corruption Framework Whistle blowing Policy, Fraud Response Plan, and Anti Money Laundering Policy.  The fighting fraud locally strategy will be launched early April 2012.
3.	Do we have dedicated counter-fraud staff?		√	There are dedicated resources only in respect of Housing and Council Tax Benefit Fraud,
4.	Do counter fraud staff review all the work of our organisation?		√	There is no dedicated resource that covers all aspects of the organisation. Any cases that arise and investigations that take place are usually completed by Internal Audit. Dependant upon the nature of the investigation this may be referred to outside organisations such as the Police. In addition we have an informal arrangement in place for sharing services with a neighbouring authority to assist with resources in the event of a large scale investigation etc.
5.	Do we receive regular reports on how well we are tackling fraud risks, carrying out plans and delivering outcomes?	√		Feedback is given as part of regular performance monitoring reports and management reports issued

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			following the completion of investigations.
6.	Have we assessed our management of counter-fraud resources against good practice?	√	Best practice ideas and issues arising from investigations are discussed and shared (in confidence) via the Staffordshire Chief Auditors Group this helps to ensure that our current procedures are in line with good practice.
7.	Do we raise awareness of fraud risks with: <ul style="list-style-type: none"> <li>• New staff (including agency staff)?</li> <li>• Existing staff?</li> <li>• Members?</li> <li>• Contractors</li> </ul>	√	In February 2012 we went live with an on-line training package in relation to Fraud & Corruption which was rolled out to all staff via the Audit pages on the Councils intranet site
8.	Do we work well with national, regional and local networks and partnerships to ensure we know about current fraud risks and issues?	√	We are Members of the Midlands Fraud Forum and The Local Authority Investigations Group (LAIOG). In addition the Audit Manager is part of the Staffordshire Chief Auditors basis which meets on a regular basis, there is a standing agenda item in respect of current fraud issues
9.	Do we work well with other organizations to ensure we effectively share knowledge and data about fraud and fraudsters?	√	There are joint working arrangements with the Department of Work and Pensions in respect of Housing Benefits, and in addition we have an Information Sharing Protocol that identifies single points of contacts within partner organisations such as the police to enable information and data to be shared.
10.	Do we identify areas where internal controls may not be performing as intended? How quickly do we take action?	√	There is a risk based audit plan produced on an annual basis. Audits review the controls that are in place and identify any significant weaknesses.
11.	Do we maximize the benefit of our participation in the Audit Commission NFI and receive reports on the matches investigated?	√	Reports provided under the NFI are reviewed and appropriate action taken in respect of the findings from these.
12.	Do we have arrangements in place that encourage our staff to raise their concerns about money laundering?	√	There is an Anti Money Laundering Policy together with procedures and guidelines that have been issued to all relevant staff. Training in these procedures has also

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			been delivered.
13. Do we have effective whistleblowing arrangements?	√		We have a Whistle Blowing Policy that is reviewed and updated annually, reminders are issued to all staff and a poster campaign has been used to raise awareness. We also subscribe to Public Concern At Work who are an independent charity that provides a Whistle Blowing hotline for employees to report any concerns
14. Do we have effective fidelity insurance arrangements?	√		There are adequate insurance arrangements in place that are reviewed annually
<b>Fighting Fraud with reduced resources</b>			
15. Have we reassessed our fraud risks since the change in the financial climate?	√		Fraud Risk Assessment are completed and reviewed annually to ensure that all risks are constantly reviewed in light of the current economic climate
16. Have we amended our counter-fraud action plan as a result?	√		Counter Fraud Plans are reviewed and reported annually to Audit & Risk Committee
17. Have we reallocated staffing as a result?		√	Staff resources are reviewed and monitored and if the need arose for additional resources arrangements are in place with neighboring authorities who could assist with investigations etc.
<b>Current Risks and Issues</b>			
<b>Housing Tenancy</b>			
18. Do we take proper action to ensure that we only allocate social housing to those who are eligible?	N/A		Not applicable to the Borough Council albeit all applicants are required to provide proof of identity as part of the application process.
19. Do we take effective action to ensure that social housing is occupied by those to whom it is allocated?	N/A		Not applicable to the Borough Council as a non-stock holding authority. The landlord is responsible for enforcing tenancy conditions.
<b>Procurement</b>			
20. Are we satisfied that procurement controls are working as intended?	√		These are regularly tested as part of routine audits, should any shortfalls be identified these are reviewed, evaluated and corrective actions agreed.
21. Have we reviewed our contract letting procedures since the	√		Contract standing orders which contain the contract

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<p>investigations by the Office of Fair Trading into cartels and compared them with best practice?</p>		<p>letting procedures are reviewed on a regular basis. Due consideration is given to guidance from the office of Government Commerce.</p>
<p><b>Recruitment</b></p>		
<p>22. Are we satisfied our recruitment procedures achieve the following:</p> <ul style="list-style-type: none"> <li>• Prevent us employing people working under false identities,</li> <li>• Confirm employment references effectively;</li> <li>• Ensure applicants are eligible to work in the UK; and</li> <li>• Require agencies supplying us with staff to undertake the checks we require?</li> </ul>	<p>√</p>	<p>These have also been reviewed in the light of the need to fulfill the requirements of the Governments Code of Connection.</p>
<p><b>Personal Budgets</b></p>		
<p>23. Where we are expanding the use of personal budgets for social care, in particular direct payments, have we introduced proper safe guarding proportionate to risk and in line with recommended good practice?</p>	<p>N/A</p>	<p>Not applicable</p>
<p>24. Have we updated our whistleblowing arrangements, for both staff and citizens, so that they may raise concerns about the financial abuse of personal budgets?</p>	<p>N/A</p>	<p>Not applicable in respect of Personal Budgets, however the Councils Whistleblowing policy does apply to everyone and is available on the Councils website.</p>
<p><b>Council Tax</b></p>		
<p>24. Are we effectively controlling the discounts and allowances we give to council taxpayers?</p>	<p>√</p>	<p>There are systems and procedures in place to deal with discounts and allowances</p>
<p><b>Housing and Council Tax Benefits</b></p>		
<p>25. In tackling housing and council tax benefit fraud do we make full use of:</p> <ul style="list-style-type: none"> <li>• National Fraud Initiative;</li> <li>• Department for Work and Pensions Housing Benefit Matching Service;</li> <li>• Internal data matching; and</li> </ul>	<p>√</p>	<p>The council actively partakes in the NFI, has arrangements in place with the DWP in respect of HBMS and shares data internally with other departments/services. At present there is a project underway with all Staffordshire authorities to share data in respect of Single Persons discount; this project will</p>

<ul style="list-style-type: none"><li>• Private sector data matching?</li></ul>			involve data matching with the private sector.
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