

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, reflecting all areas of work that the team may be involved in during the financial year.

The Counter Fraud Team comprises two Senior Fraud Investigators and one Fraud Investigator. After taking into account provisions for non- fraud duties, such as, holidays, sickness, training and administration / management time, totaling 325 days, there are 464 working days available to undertake fraud duties.

The plan includes, activity linked to fraud awareness and prevention, proactive counter fraud work and responsive investigations.

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. For example, if the data matching activity linked to the National Fraud Initiative 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	Target quarter for completion	Days Allocated	Comments
1	Corporate Policies	<p>Review and refresh the following policies to ensure they remain in line with best practice.</p> <ul style="list-style-type: none"> • Anti-Fraud and Corruption Strategy • Fraud and Corruption Prosecution Policy • Whistleblowing Policy • Anti-Bribery and Corruption Policy • Anti-Money Laundering Policy 	<p>Q1 Q2 Q1 Q2 Q2</p>	10	Completed – all policies reviewed, and presented to Audit Committee July and October 2023

2	Fraud Awareness Training	<p>Review and if required refresh e-learning training module for fraud awareness</p> <p>Plan awareness sessions and training for 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.</p>	<p>Q4</p> <p>Q4</p>	5	
3	Fraud Risk Assessments	Identify fraud risk areas in the Council by developing working arrangements with service departments.	Q4	5	
4	Corporate Working Groups	Attend Corporate Working Group meetings and Project Boards to offer advice on fraud risks and prevention.	Ongoing	2	<p>Attended group with Parking Services and Customer Services to advise of Resident Parking Permit process.</p> <p>Attended group meeting for Business Rates.</p> <p>Attended group meeting with Six Town Housing.</p>
5	Review of Right to Buy Processes	<p>Taking a digital first approach and moving forms online</p> <p>Review fraud risks of the application stages of the RTB process.</p>	<p>Q3</p> <p>Q4</p>	15	<p>Work in progress – advising in the process of moving paper based right to buy applications to an online process</p> <p>Undertake fraud checks on RTB applications throughout the year.</p>

					Link in with Internal Audit review of the RTB Process, and assist with any fraud checks / advice to support the review.
6	Review of Blue Badge Processes	<p>Establish process for badges confiscated by other authorities</p> <p>Re-establish links with Parking Services and NSL to encourage the real time reporting of Blue Badge misuse to enable better case outcomes.</p>	<p>Q1</p> <p>Q4</p>	4	Complete – worked with contact centre to establish process for handling badges which have been confiscated by other authorities, as being mis-used, and returned to Bury. Agreed process for returning the badge to the holder.
7	Communicate Successful cases	Develop communications strategy to publish counter fraud and corruption news internally and externally.	Ongoing	3	

Pro-Active Counter Fraud Activity

Ref	Activity	Scope	Target	Days Allocated	Comments
1	NFI	Coordinate the Council's participation in National Fraud Initiative Exercises, including assessments of referrals received and liaison with relevant departments on actions required.	Q3	75	Work in progress

2	Right to Buy Checks	Perform checks on all Right to Buy applications to identify any potential fraud including money laundering.	Ongoing	50	Ongoing
3	Stand alone Council Tax Support	Perform checks on a sample of accounts where Council Tax Support has been awarded where Benefits payments are not in place, ensuring that the homeowner is eligible for Council tax Support	Q4	30	
4.	Welfare Payments	Perform checks on a sample of Welfare payments made by the Revenues and Benefits Services to ensure that the recipient was eligible for the payment.	Q4	30	
5.	Adult Care - Direct Payments	Perform checks on a sample of Direct payments made to individuals who arrange their own care to ensure that the applicant was eligible for the payment and that the payments are being used appropriately. .	Q4	30	

Responsive Investigation Activity

Ref	Activity	Scope	Target	Days Allocated	Comments
1	Responsive investigation work(external)	Conduct investigations into referrals of suspected fraud committed against the Council by external sources. This may include but is not limited to illegal subletting of council houses, Council Tax single person discount fraud, Council Tax Support Fraud, Blue Badge misuse, Business Rates Relief frauds and invoice fraud.	Ongoing	131	Ongoing
2	Responsive investigation work(Internal)	Conduct investigations into suspected fraud or malpractice and assist with disciplinary investigations as required.	Ongoing	20	Ongoing

Other Counter Fraud Activity

Ref	Activity	Scope	Target	Days Allocated	Comments
1	Review findings of COVID 19 Grant cases	Investigate and review individual allegations of COVID 19 Grant fraud and assess any further impact on Business Rates Accounts for discounts, reliefs and exemptions.	Q2	25	Completed
2	Keep up to date with best practice	Assess ourselves against Fighting Fraud & Corruption Locally Strategy Attend Lancashire & Greater Manchester Fraud Investigators Group	Q4 Ongoing	8	Ongoing
3	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.	Ongoing	14	Ongoing
4	Partnership working	Attend Organised Crime Group meetings, share information and participate in days of action to support Greater Manchester Police in making Bury a hostile environment for criminal activity.	Ongoing	7	Ongoing

Non-Fraud Activity (325 days)

Ref	Activity	Scope	Target	Days Allocated
1	Management / Admin	Supervision, HR responsibilities (e.g. 1:1's, Health and Safety / risk assessments), CE briefings Administration – electronic file maintenance / server maintenance	Ongoing	83
3	Training	Senior Fraud Investigator commencing CIPFA in September Management Development Programme (2 Senior Fraud Investigators Fraud Investigator completed Counter Fraud Investigator Level 4	Ongoing	78

4	Annual leave / banked leave / purchased leave/ bank holidays / sickness		Ongoing	164
	Total			325