Assurance Group

Counter Fraud Strategy

2024

Date Last Reviewed:	July 2024
Approved by:	Audit & Standards Committee
Date Approved:	2 December 2024
Review Date:	June 2025
Document Owner:	Head of Assurance

To create a culture and organisational framework, through a series of comprehensive and inter-related procedures and controls, which maximises the deterrence of fraud, minimises the incidence & impact of fraud against the Council, and ensures, through professional investigation, effective outcomes including sanctions and redress against those who defraud the Council. The Strategy is based on the following principles:

Acknowledge responsibility
The Council has ensured that fraud risks are managed effectively across the whole organisation.
Identify risks
We use fraud risk to understand specific exposures, changing patterns in fraud and corruption threats and the potential consequences to the Council and its service users.
Develop a strategy
We have set out the Council approach to managing fraud risks and defining responsibilities for action.
Provide resources
We have appropriate resources to support the counter fraud strategy.
Take action
We have a suite of policies to support the counter fraud strategy and act to deter, prevent, detect and investigate fraud.

Links to Corporate Objectives

The Borough Manifesto sets out the long-term, 20-year vision for the future of Barking and Dagenham. It describes how the council, our partners and the whole community are working together to realise our shared vision of a more powerful, resilient, connected community; 'one borough; one community; no-one left behind'. To achieve the Vision, the Council's priorities are:

1. Residents are supported during the current Cost of Living Crisis.
2. Residents are safe, protected, and supported at their most vulnerable.
3. Residents live healthier, happier, independent lives for longer.
4. Residents prosper from good education, skills development, and secure employment.
5. Residents benefit from inclusive growth and regeneration.
6. Residents live in, and play their part in creating, safer, cleaner, and greener neighbourhoods.
7. Residents live in good housing and avoid becoming homeless.

This Strategy ensures resources are correctly applied in the provision of high-quality services and initiatives that deliver these Corporate priorities.

Resources & Skills

The Assurance Group will investigate all issues of suspected fraud and irregularity and promote the counter fraud agenda through reactive, proactive and preventative activities.

All investigators are professionally accredited and undertake appropriate continuous professional development. The authority for the Assurance Group to investigate is enshrined in the Council's Constitution and Financial Regulations which provide authority to have access to all records, and to all council premises.

Investigators are authorised to exercise powers to require information pursuant to Section 4 of the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014 in cases of suspected social housing fraud.

The Assurance Group has access to an Accredited Financial Investigator to enable redress under the Proceeds of Crime Act (POCA). Any monies recovered will be used to further promote counter fraud across the Council.

Responsibility

The Assurance Group will champion the tough stance against fraud and promote counter fraud across the council, its Members, employees, contractors, partner agencies, service users and associated companies. Professional investigators will work in accordance with relevant codes of practice and Council policies, while always maintaining confidentiality, complicity with the employee code of conduct and guidelines of relevant legislation.

Liaison

The Assurance Group will utilise all methods available to detect fraud. Arrangements are in place to actively participate in the National Fraud Initiative (NFI) as well as continuing to develop and support initiatives that involve the exchange of information and data matching between the Council and other agencies.

In addition, we will work with colleagues in other Local Authorities and utilise counter fraud networks such as the London Boroughs Fraud Investigators Group (LBFIG), London Audit Group (LAG) and the Chartered Institute of Public Finance & Accountancy (CIPFA) Counter Fraud Centre.

Taking Action and Supporting Polices

Deterrence
We will publicise our counter fraud measures to promote the deterrent message, including the effectiveness of controls including the governance framework, arrangements that are in place to detect fraud, the professionalism of those who

investigate fraud, the Council's success in applying proportionate sanctions and the prompt, effective recovery of losses.

Prevention
The Assurance Group works to support management in assessing compliance with the Council's policies and ensuring that adequate levels of internal control are included in operational procedures. The Assurance Group will advise and promote awareness on the importance of considering fraud risks as part of good governance arrangements as well as managing the changing risk profile of fraud in order to tackle new areas.

Detection
In addition to maintaining channels for the report of fraud, the Assurance Group will proactively use all legal and cost-effective means to detect fraud, including working with other organisations and participating in national data matching schemes.

Investigation
We will investigate all allegations of fraud in line with our polices and adhering to relevant legislation. Outcomes from investigations will include recommendations as well as necessary changes to systems and procedures to ensure that similar frauds will not recur.

Recovery and Sanctions
Where fraud is identified, we will seek to recover losses and prosecute or apply other sanctions to perpetrators. Where fraud by employees is indicated, then action will be taken in accordance with the Council's disciplinary procedures. This may be in addition to any civil recovery action or sanctions.

Redress
Compensation, or confiscation, under proceeds of crime legislation will be sought wherever appropriate in accordance with the Prosecution Policy. Our aim is to ensure that those who seek to defraud the Council do not profit from their criminal activity.

Policies
All Counter Fraud work will be undertaken in accordance with relevant policies as follows:

Counter Fraud Policy including Fraud Response Plan	Our commitment to reducing opportunities for fraud and corruption across our services and taking the strongest possible action against those who seek to defraud us.
Prosecution Policy	Our approach to seeking redress/sanction against those who seek to defraud the Council.
Money Laundering Policy	Our commitment to complying with the requirements of the Terrorism Act 2000, Proceeds of Crime Act 2002, Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to in this guidance as 'the Regulations'), Criminal Finances Act 2017, Terrorist Asset-Freezing Act 2010, Anti-terrorism, Crime and Security Act 2001,

	Counter terrorism Act 2008, Schedule 7 and the Economic Crime (Transparency and Enforcement) Act 2022
Whistleblowing Policy	Our commitment to the Public Disclosure Act 1998 and supporting employees who raise concerns about various serious issues.
Regulation of Investigatory Powers Policy	Our commitment to adhering to RIPA 2000 in relation to covert surveillance.
Anti-Bribery Policy	Our commitment to the Bribery Act 2010

Review & Assessment/Quality Assurance

The strategy and associated polices will be reviewed annually and assessed against best practice across local authorities. The outcomes from counter fraud work will be periodically reported to Members of the Audit & Standards Committee and outcomes assessed to evaluate success.