

## Code of Practice Assessment

## Appendix A

| Key Principle                 | Specific Steps   | Council position   | Action Plan   |
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| A. Acknowledge responsibility | A1 The council's leadership team acknowledge the threats of fraud and corruption and the harm they can cause to the organisation, its aims and objectives and to its service users.                          | This is acknowledged in the council's anti-fraud policy and also through the council's Code of Conduct.  | N/A   |
|                               | A2 The council's leadership team acknowledge the importance of a culture that is resilient to the threats of fraud and corruption and aligns to the principles of good governance.                           | This is acknowledged in the council's anti-fraud policy and also through the council's Code of Conduct.  | N/A   |
|                               | A3 The governing body acknowledges its responsibility for ensuring the management of its fraud and corruption risks and will be accountable for the actions it takes through its governance reports.         | The annual governance report where appropriate refers to fraud and corruption risks and actions.<br>The Audit and Governance Committee's agreed terms of reference includes the responsibility to monitor the effectiveness of the council's strategies to counter fraud and corruption. | As recommended in the code, consideration will be given to including a reference to the CIPFA Code of Practice in future annual governance reports. |
|                               | A4 The governing body sets a specific goal of ensuring and maintaining its resilience to fraud and corruption and explores opportunities for financial savings from enhanced fraud detection and prevention. | Whilst a specific goal is not set the Audit and Governance Committee have responsibility for ensuring the council's exposure to fraud risks is appropriate.  | N/A   |
| B. Identify risks             | B1 Fraud risks are routinely considered as part of the organisation's risk management arrangements.  | An annual fraud risk assessment is completed by internal audit based on their knowledge of the organisation and the associated fraud risks.  | N/A   |

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|                       | B2 The organisation identifies the risks of corruption and the importance of behaving with integrity in its governance framework.  | The council has identified the risk of fraud and corruption in its anti-fraud strategy and policy. The council's Code of Conduct sets out the behaviours expected of staff and makes clear the need to act with integrity. The Code of Conduct is communicated to all staff on a regular basis.<br>A fraud awareness e-learning course is to be rolled out to relevant staff throughout the council. | A fraud awareness e-Learning course will be rolled out to key staff during 2015.                 |
|                       | B3 The organisation uses published estimates of fraud loss, and where appropriate its own measurement exercises, to aid its evaluation of fraud risk exposures.                          | The annual fraud risk assessment incorporates information on fraud risks from a wide range of internal and external sources including CIPFA, NAFN, Greater Manchester Council Fraud Group and the Audit Commissions Protecting the Public Purse report.  | N/A  |
|                       | B4 The organisation evaluates the harm to its aims and objectives and service users that different fraud risks can cause.  | The impact of each fraud risk is considered as part of the fraud risk assessment.  | N/A  |
| C. Develop a strategy | C1 The governing body formally adopts a counter fraud and corruption strategy to address the identified risks and align with the organisation's acknowledged responsibilities and goals. | The council has an anti-fraud strategy and policy. The documents remain relevant but require updating to account for revised job titles and roles and responsibilities.  | It is intended that this strategy and policy will be reviewed following the Phase 1 restructure. |
|                       | C2 The strategy includes the organisation's use of joint working or partnership approaches to managing its risks, where appropriate.   | The anti-fraud strategy and policy include joint working arrangements.   | N/A  |
|                       | C3 The strategy includes both proactive and responsive approaches that are best suited to  | The anti-fraud strategy and policy includes proactive and responsive approaches to   | N/A  |

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|                      | the organisation's fraud and corruption risks.  | fraud risk.  |  |
|                      | C4 The strategy includes clear identification of responsibility and accountability for delivery of the strategy and for providing oversight.                                | The anti-fraud strategy and policy includes clear responsibility and accountability.   | It is intended that this strategy and policy will be reviewed following the Phase 1 restructure. |
| D. Provide resources | D1 An annual assessment of whether the level of resource invested to counter fraud and corruption is proportionate for the level of risk.                                   | This is considered as part of the annual Internal Audit planning process and a report is submitted to the Audit and Governance Committee for approval.                                       | N/A  |
|                      | D2 The organisation utilises an appropriate mix of experienced and skilled staff, including access to counter fraud staff with professional accreditation.                  | The internal audit team includes three individuals who have experience of performing a number of investigations and hold the CIPFA Certificate in Investigative Practices Certificate.       | N/A  |
|                      | D3 The organisation grants counter fraud staff unhindered access to its employees, information and other resources as required for investigation purposes.                  | The counter fraud team have access to all information that they require for investigation purposes.  | N/A  |
|                      | D4 The organisation has protocols in place to facilitate joint working and data and intelligence sharing to support counter fraud activity.                                 | The organisation has arrangements in place to facilitate joint working and data/intelligence sharing.  | N/A  |
| E. Take action       | E1 The organisation has put in place a policy framework which supports the implementation of the counter fraud strategy.  | The council has an anti-fraud strategy and policy.   | N/A  |
|                      | E2 Plans and operations are aligned to the strategy and contribute to the achievement of the organisation's overall goal of maintaining resilience to fraud and corruption. | An annual counter fraud plan is produced as part of the annual Internal audit planning process. Progress is monitored as part of the overall internal audit progress reporting arrangements. | N/A  |
|                      | E3 Making effective use of national or sectoral initiatives to detect fraud or prevent fraud, such as data matching or intelligence sharing.                                | The council fully participates in the National Fraud Initiative and receives and shares fraud intelligence information where appropriate.  | N/A  |

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|  | E4 Providing for independent assurance over fraud risk management, strategy and activities.  | The counter fraud work feeds into the internal audit plan and into the overall audit opinion on how the organisation manages risks.  | N/A |
|  | E5 There is a report to the governing body at least annually on performance against the counter fraud strategy and the effectiveness of the strategy from the lead person(s) designated in the strategy. Conclusions are featured in the annual governance report. | An annual counter fraud report is submitted to the Audit and Governance Committee. Where appropriate conclusions are then incorporated into the Internal Audit Annual Report and the annual governance report. | N/A |