



London Borough of Croydon
Proactive Report
Counter Fraud Service Review

March 2017

Report issued to:

Lisa Taylor - Director of Finance, Investment & Risk

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Status of Our Reports

This report ('Report') was prepared by Mazars Public Sector Internal Audit Limited at the request of the London Borough of Croydon and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, we have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

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Please refer to the Statement of Responsibility set out on page 5 of this report for further information about responsibilities, limitations and confidentiality.

1. Introduction and Background

- 1.1. This report summarises our work in examining the provision of counter fraud service in the London Borough of Croydon (the Council), following the transfer of benefit investigations and investigators to the Department for Works and Pensions. The objectives of our work were to:
- Analyse the strengths and weaknesses of the Council's current counter fraud arrangements; and
 - Based on our experience, knowledge and known best practice, make recommendations to help address areas for improvement.
- 1.2. We met with members of the Corporate Anti-Fraud Team (CAFT) and our work examined:
- The type of cases CAFT has examined during the year 2016/17 and the sources of the referrals;
 - The policies and procedures that guide investigations within the Council;
 - Key processes and controls in mitigating risk to an acceptable level;
 - Any key performance indicators and targets which CAFT reports against;
 - The planned work CAFT has in place for 2016/17, the number of days it is expected that this work will take to deliver and what cashable savings these are expected to achieve; and
 - How CAFT delivers the following elements of the CIPFA Code of Practice on Counter Fraud (Managing the Risk of Fraud and Corruption):
 - Acknowledge Responsibility,
 - Identify Risks,
 - Develop Strategy,
 - Provide Resources, and
 - Take Action.
- 1.3. This report sets out the findings and recommendations arising from our work. We have raised two priority 2 and two priority 3 recommendations for management's consideration and these are detailed in the recommendations section below.
- 1.4. We would like to acknowledge the support of the CAFT Investigations Manager and members of the team.

2. Findings and Good Practise

- 2.1. The Council has a robust Anti-Fraud & Corruption Strategy that is reviewed annually by the General Purpose Audit Committee (GPAC). This anti-fraud culture is evidenced through detailed and well written policies and procedures that are easy to read and available on the intranet. The anti-fraud culture is further underpinned through the high level of support and acknowledgment received from the Council's leadership team and GPAC. The Council's leadership team demonstrate their acknowledgement of the threats of fraud, bribery and corruption with a high level statement underwritten by the Director of Governance. The zero tolerance message and tone is set out at the top of the organisation and is exemplified throughout.
- 2.2. The Council has a clear strategy for its counter fraud approach, which is supported by the policy framework it has in place. The policy framework has an Anti-Fraud and Corruption Response Plan with clear reporting lines and areas of responsibility. This is further supported by the Anti-Bribery and Anti-Money Laundering Procedures and the ICT Access Policy; all backed up by automatic pop-ups and acceptable use rules. The policies are in line with the relevant legislative requirements and are reviewed regularly. This aligns with the principals of good governance and the CIPFA Code.
- 2.3. The fraud risk strategy and response plan includes joint working. There is an effective culture of joint working and information sharing with internal and external partners, maximising the cost effectiveness of resource and expertise. We noted that CAFT resources are outsourced to neighbouring boroughs and that CAFT participates in other partnerships such as the CIPFA London Counter Fraud Hub, ASB team, parking services and Merton Trading Standards.
- 2.4. There is a strong proactive culture throughout the Council and it was noted during our discussions and meetings with staff in CAFT and various stakeholders that this is growing. The high level of work carried out and the results achieved are publicised. The Council also offer anti-fraud training and have a list of brokered services used to pitch for work and publicise CAFT's capabilities. CAFT also make use of e-learning tools to promote and train new and existing members of staff.
- 2.5. We noted that fraud risks are regularly identified and documented through the high standard and range of investigations carried out by CAFT. This was evident when reviewing current year case statistics, team meeting minutes and the reports to management and GPAC. CAFT is on target to achieve Key Performance Indicators (KPIs) and case statistics, although it was noted that financial savings are slightly down on where CAFT would like this to have been. CAFT meeting minutes highlighted that 36 cases had been accepted for investigation since the previous team meeting and that there were a further seven cases waiting to be risk scored. We note that benchmarking is difficult at the current time due to the recent move to the Single Fraud Investigation Service. We also noted that the CAFT Investigations Manager is planning to develop a fraud risk register.
- 2.6. The Council has documented areas where financial savings have been made through enhanced fraud detection. CAFT has a well-developed team of both highly experienced and relatively newly recruited investigation officers, including two financial investigators who are also

outsourced to neighbouring boroughs. During discussions and interviews with various stakeholders, we noted that the Council did identify fraud risks on a regular basis through high level case work and case reviews. Management also consider fraud risks through regular reviews and discussions at GPAC.

- 2.7. The Council has in place formal procedures for the reporting of suspected fraud and corruption and investigation issues raised. There are online reporting platforms and a hotline for the public to report concerns. CAFT has appropriate systems to capture and record reported cases.
- 2.8. There are clear procedures in place that ensure that investigations are carried out to a professional standard, fairly, legitimately and relative to the intended action. All cases reviewed were carried out to a high standard which is exemplified in the outcomes. Investigations and interviews are carried out in compliance with the relevant legislation such as PACE, CPIA and the ACPO guidelines. All investigations, allegations and outcomes are recorded on the Council's InCase case management system. A high level of knowledge and experience was demonstrated by CAFT staff during this review. We further reviewed the audit trail on a sample of cases and are confident that if another investigator had carried out an investigation on the same case, a similar outcome would be achieved.
- 2.9. All data and evidence relating to cases and outcomes is appropriately stored and retained and is only accessible by authorised personnel. The InCase case management system is password protected and maintains an audit trail and log of any access or files viewed, with every entry date and time stamped. A further level of protection is offered on internal cases where the secure access level is only granted to a particular investigator appropriate to that level. The system also has an alert and reminder system ensuring that unnecessary delays in reviewing cases is averted.
- 2.10. New Council staff are made aware of the Council's policies and procedures, and are also provided with fraud awareness training during their induction. Records are kept and staff sign off to indicate awareness of the guidance and requirements.
- 2.11. The Council make good use of DCLG funding by supporting housing related fraud and the purchase of ILATCH. ILATCH was purchased for a period of three years and is a tool used to assist the Council and the wider public in a proactive manner to prevent members of public being taken advantage of when renting private sector housing. The Council is also a pilot site for the newly formed CIPFA London Counter Fraud Hub.

3. Recommendations

- 3.1. The following table lists the recommendations arising from our work.

	Recommendation	Priority	Management Response	Responsible Officer and Deadline
1	Although risk management is evident through the high level of cases investigated, consideration should be given to developing a fraud risk register to ensure that significant current and emerging risks are considered. This will help to inform the Council's corporate risk register and assist when considering resource for future proactive plans.	2	Agreed - The Council is working with other London Boroughs to develop a fraud risk register as part of its ground breaking work as a pilot member of the London Counter Fraud Hub. This will be used by the Council to inform the corporate risk register as well as informing planning for pro-active fraud work in future years.	CAFT Investigations Manager (David Hogan) 31 December 2017
2	The Council should ensure that photographs are taken and added to tenancy audits/investigations when engaging clients, this to align with national identification standards.	2	Agreed - This will be discussed with the relevant Council division with our strong recommendation that it should be implemented.	CAFT Investigations Manager (David Hogan) To promote the recommendation by 31 March 2017
3	Although publicised internally, the Council should consider a high profile campaign using all available sources of social media to further increase fraud awareness; publish latest cases and results; and clarify how to report suspected fraud, bribery and corruption.	3	Agreed - CAFT will work with the Council's media team to develop a strategy for implementing this.	CAFT Investigations Manager 30 September 2017

	Recommendation	Priority	Management Response	Responsible Officer and Deadline
4	Although relevant counter fraud policies and procedures are reviewed regularly, the Council should consider making minor adjustments to bring these into line with the CIPFA Code (Acknowledge Responsibility, Identify Risks, Develop Strategy, Provide Resources, and Take Action).	3	Agreed - The Anti-Fraud & Corruption Strategy has now been updated to reflect the CIPFA Code and will be reviewed at GPAC on 22 March 2017.	CAFT Investigations Manager To published on line by 31 March 2017
	The Whistleblowing Policy should also be updated to make reference to the Public Interest Disclosure Act 1998.		Not agreed - The Council's Whistleblowing Policy already refers to the Act.	N/A

Our recommendations to further enhance the overall culture and environment to tackle fraud, bribery and corruption across the Council are prioritised as follows:

- Priority 1** Major organisational issues to be addressed for the attention of senior management and GPAC.
- Priority 2** Important local issues to be addressed by senior and local management in their areas of responsibility.
- Priority 3** Minor / best practice issues to be addressed by local management.

Recommendations will be fed into Internal Audit's Progress Report to monitor management feedback and implementation as required.

Statement of Responsibility

We take responsibility to the London Borough of Croydon for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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Appendix 1 - Terms of Reference Extract

2. Description of Planned Work

2.1. We will request from CAFT:

- Details of the number of investigations undertaken during 2015/16 and 2016/17;
- The Council's:
 - Anti-fraud policy,
 - Anti-money laundering policy,
 - Fraud response plan,
 - Bribery policy, and
 - Any other relevant policies so far as they relate to investigation of fraud and as they are identified to us;
- Details of relevant information sharing agreements and service level agreements between the Council and its partner organisations; and
- Details of the KPIs that CAFT report against and the targets which have been set for the work over the year.

2.2. We will discuss with the CAFT Investigations Manager the current position with regard to the CIPFA Code and provide a red, amber, green summary of our conclusions based on this discussion.

2.3. We will report on the progress of CAFT and presence or absence on the above mentioned items and make recommendations for the Council's consideration with regard to the strengthening policies, targets, information sharing agreements, SLAs and work plans.

2.4. If we identify any system weaknesses in the course of our work, our report will include recommendations for strengthening the control environment.

2.5. Should we identify a requirement to perform any additional procedures to those set out in 2.1 to 2.2 above, we will agree these with the Head of Governance and Assistant Director of Finance prior to undertaking further work.

2.6. At the conclusion of our work, we will provide a written report to the Assistant Director of Finance.

Appendix 2 - Gap Analysis

The terms of reference for this work required a RAG/GAP analysis between the current position of the Council and good practices in countering fraud, bribery and corruption. We have detailed the gap analysis below using the CIPFA Code as a guide and our own knowledge of good practices across the public sector. We would recommend that the Council consider the gap analysis and consider implementing actions in order to mitigate the areas identified as gaps. We would note that the scope of our work did not include an assessment of the adequacy and effectiveness of the controls in place from a counter fraud perspective.

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
Acknowledge Responsibility The governing body should acknowledge its responsibility for ensuring that the risks associated with fraud and corruption are managed effectively across all parts of the organisation.				
A1	The organisation’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.	The Council’s leadership team acknowledge the threats of fraud and corruption with a high level statement underwritten by the Chief Executive Officer. Quarterly reports on latest cases and statistics are updated and reviewed by senior management and GPAC.	N/A	N/A
A2	The organisation’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.	The Council’s leadership team acknowledge the importance of a culture that is resilient to the threats of fraud, bribery and corruption and have undertaken to have any gaps identified through employing an independent assessor and to further identify areas where	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		improvements can be made. This will provided a non-biased overview of the culture of the organisation.		
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.	<p>The Council identifies fraud risks on a regular basis through high level case work and case reviews. Management and GPAC receive quarterly reports on latest cases and statistics.</p> <p>A corporate risk register is in place and is managed by the Head of Risk and Corporate Programs. A fraud risk register is planned for development.</p>	N/A	N/A
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.	<p>The Council seeks to maintain resilience to fraud, bribery and corruption through policies and procedures.</p> <p>The Council identifies fraud risks on a regular basis through high level case work and case reviews. Management and GPAC receive quarterly reports on latest cases and statistics.</p> <p>The Council have documented areas where financial savings through investigations have been</p>	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		made. Two Financial investigators are also outsourced to neighbouring boroughs.		
B Identify Risks Fraud risk identification is essential to understand specific exposures to risk, changing patterns in fraud and corruption threats and the potential consequences to the organisation and its service users.				
B1	Fraud risks are routinely considered as part of the organisation’s risk management arrangements.	<p>The Council identifies fraud risks on a regular basis through high level case work and case reviews. Management and GPAC receive quarterly reports on latest cases. A corporate risk register is in place and is managed by the Head of Risk and Corporate Programs. A fraud risk register is planned for development.</p> <p>Management do however consider risks and this is discussed in meetings.</p>	The Council should give consideration to developing a fraud risk register to ensure that significant current and emerging risks are considered. This will help to inform the Council’s corporate risk register and assist when considering resources for future proactive plans. The CAFT Investigations Manager has requested templates to assist in developing a fraud risk register.	
B2	The organisation identifies the risks of corruption and the importance of behaving with integrity in its governance framework.	<p>The Council’s leadership team acknowledge the threats of fraud, bribery and corruption in a high level statement underwritten by the Chief Executive Officer and the Head of Governance.</p> <p>An online statement of zero</p>	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		tolerance and what is expected by members and colleagues includes declarations of interest and the Nolan principals of public life. A recent case was provided and this demonstrated a zero-tolerance approach.		
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 Council is currently adapting to and following the CIPFA Code. Protecting the Public Purse and Fighting Fraud Locally publications are reviewed and fraud losses are calculated accordingly. Grant Thornton are also used to calculate fraud losses and these are publically available. Management and GPAC receive quarterly reports on latest cases and statistics.	N/A	N/A
B4	The organisation evaluates the harm to its aims and objectives and service users that different fraud risks can cause.	A corporate risk register is in place and is managed by the Head of Risk and Corporate Programs. Communication between the risk department and CAFT is good and other risks are often considered.	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
C Develop a Strategy An Organisation needs a counter fraud strategy setting out its approach to managing its risks and defining responsibilities for action.				
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.	<p>The Council has a robust Anti-Fraud & Corruption Strategy that is reviewed annually by GPAC. This anti-fraud culture is evidenced through detailed and well written policies and procedures that are easy to read, easily available and updated and reviewed to match legislation. We also noted a Prosecution of Staff Policy.</p> <p>Further evidence of the anti-fraud culture was noted through meetings and on-going discussions amongst CAFT members of staff who have volunteered to take on extra roles in developing risk registers and proactive planning.</p>	N/A	N/A
C2	The strategy includes the organisation’s use of joint working or partnership approaches to managing its risks, where appropriate.	The Anti-Fraud & Corruption Strategy and the Response Plan includes joint working. There is an effective culture of joint working and information sharing with external and internal partners to make best use of resources and	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		<p>expertise.</p> <p>We noted that CAFT resources are outsourced to neighbouring boroughs. CAFT participates in partnerships such as the London Counter Fraud Hub, ASB team, parking services and Merton Trading Standards.</p>		
C3	<p>The strategy includes both proactive and responsive approaches that are best suited to the organisation's fraud and corruption risks.</p> <p>Proactive and responsive components of a good practice response to fraud risk management are set out below:</p>	<p>The Anti-Fraud & Corruption Strategy and the Response Plan makes best use of current resources.</p> <p>We noted that whilst CAFT is strong in reacting to the Council's fraud and corruption risks, it is also proactive in creating awareness of outcomes achieved.</p>	N/A	N/A
	Proactive			
	Developing a counter-fraud culture to increase resilience to fraud.	<p>An anti-fraud culture is evident and growing constantly with discussion and reports to management meetings and GPAC. Management and GPAC receive quarterly reports on latest cases and statistics.</p> <p>CAFT publicise and offer anti-fraud training which is managed by</p>	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		Organisational Development. A list of brokered services is published and used to pitch for work and publicise capabilities. E-learning modules are used.		
	Preventing fraud through the implementation of appropriate and robust internal controls and security measures.	The Council currently implements robust controls and security measures which are monitored by a programme of internal audit work. Our review of a recent abuse of position case by a member of staff demonstrated strong internal controls, security and collaborative working.	The Council should give consideration to ensuring that photographs are taken and added to tenancy audits/investigations when engaging clients, this to align with national identification standards.	
	Using techniques such as data matching to validate data.	The Council participates in the National Fraud Initiative and is a pilot site for the CIPFA London Counter Fraud Hub. An annual review of council tax discounts is outsourced to Northgate, this providing an end to end service demonstrating savings. Data is also matched through Call Credit.	N/A	N/A
	Deterring fraud attempts by publicising the organisation's anti-fraud and corruption stance and the	The Council publicise anti-fraud attempts within the organisation. CAFT produce a quarterly	The Council should give consideration to a campaign using all available sources of social	

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
	actions it takes against fraudsters.	newsletter 'Fraud Defence'. There are also press releases when needed.	media to further increase fraud awareness; publish latest cases and results; and clarify how to report suspected fraud, bribery and corruption.	
	Responsive			
	Detecting fraud through data and intelligence analysis.	As noted above, various data matching exercises are currently in use.	N/A	N/A
	Implementing effective whistleblowing arrangements.	To ensure that concerns or complaints from the public can be raised, the Council has adopted a formal complaints policy which sets out how complaints can be made, what should be expected and how to appeal. In addition, the Council has adopted a fraud hotline. A Whistleblowing Policy has been adopted to enable staff, partners and contractors to raise concerns of crime or maladministration confidentially. This has been designed to enable referrals to be made without fear of being identified. In addition, the Council has adopted a whistleblowing hotline supported by a third sector	The Council should give consideration to updating the Whistleblowing Policy to make reference to the Public Interest Disclosure Act 1998.	

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		<p>partner. These arrangements are part of ensuring effective counter-fraud and anti-corruption arrangements are developed and maintained in the Council.</p> <p>Case examples viewed: Registrar case and a procurement fraud case received via the whistleblowing hotline.</p>		
	Investigating fraud referrals.	<p>We reviewed a mix of cases investigated by CAFT, including joint working with other boroughs. A number of insurance fraud and trading standards cases have also been investigated.</p> <p>CAFT demonstrates a strong mix of investigative experience and produced a high standard of work throughout this year and the previous year.</p>	N/A	N/A
	Applying sanctions, including internal disciplinary, regulatory and criminal.	<p>We identified clear examples of CAFT applying sanctions and seeking redress, including recovering of money where possible.</p> <p>Management and GPAC receive quarterly reports on latest cases and statistics.</p>	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
	Seeking redress, including the recovery of assets and money where possible.	The Council have two Financial Investigators who are outsourced to neighbouring boroughs. This work has been successful in the recovery of compensation and confiscation where the Council's assets have been effected.	The Council should give consideration to a campaign using all available sources of social media to further increase fraud awareness; publish latest cases and results; and clarify how to report suspected fraud, bribery and corruption.	
C4	The strategy includes clear identification of responsibility and accountability for delivery of the strategy and for providing oversight.	The Anti-Fraud & Corruption Strategy and the Response Plan defines clear lines of responsibility and accountability. Senior management and GPAC provide oversight and oversee the deliverables.	N/A	N/A
D Provide Resources The organisation should make arrangements for appropriate resources to support the counter fraud strategy.				
D1	An annual assessment of whether the level of resource invested to counter fraud and corruption is proportionate for the level of risk.	Annual reports are signed off by the senior management and GPAC taking the budget and resources into consideration. Budget responsibility currently sits with senior management, but will soon fall under the CAFT Investigations Manager. Income is received from providing services to other boroughs.	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		The current team provides a wide range of cover in many fields of expertise and is working to near capacity. Using a fraud risk register, consideration should be given to the level of resource required to combat fraud, bribery and corruption in further developing an anti-fraud culture.		
D2	The organisation utilises an appropriate mix of experienced and skilled staff, including access to counter fraud staff with professional accreditation.	CAFT has a well-developed team of both highly experienced and relatively new investigation officers, including two financial investigators who are also outsourced to neighbouring boroughs. There is a strong element of trust and team spirit evident amongst all.	N/A	N/A
D3	The organisation grants counter fraud staff unhindered access to its employees, information and other resources as required for investigation purposes.	The Council takes a tough stance on fraud and as such allows CAFT and internal audit staff the access they require for investigations, provided this is reasonable and proportionate.	N/A	N/A
D4	The organisation has protocols in place to facilitate joint working and data and intelligence sharing to support counter fraud activity.	The Council currently work with the police and other agencies. MOUs are in place and will be developed to reflect changing	N/A	N/A

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		<p>practices. CAFT is currently working with churches to gain nomination rights for outcomes.</p> <p>ILATCH has been purchased for a period of three years and is a tool used to assist the Council and the wider public in a proactive manner to prevent members of public being taken advantage of when renting private sector housing.</p> <p>The Council is also a pilot site for the newly formed CIPFA London Counter Fraud Hub.</p>		
<p>E Take Action The organisation should put in place the policies and procedures to support the counter fraud and corruption strategy and take action to prevent, detect and investigate fraud.</p>				
<p>E1</p>	<p>The organisation has put in place a policy framework which supports the implementation of the counter fraud strategy.</p> <p>As a minimum the framework includes:</p> <ul style="list-style-type: none"> • Counter fraud policy; • Whistleblowing policy; • Anti-money laundering policy; • Anti-bribery policy; 	<p>The Council has a robust Anti-Fraud & Corruption Strategy and a strong commitment to counter fraud.</p> <p>The relevant policies and procedures and the Response Plan are up to date and reviewed regularly.</p>	<p>Although relevant counter fraud policies and procedures are reviewed regularly, the Council should give consideration to making minor adjustments to bring these policies and procedures into line with the CIPFA Code (Acknowledge Responsibility, Identify Risks, Develop Strategy, Provide Resources, and Take Action).</p> <p>The Council should also give</p>	

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
	<ul style="list-style-type: none"> • Anti-corruption policy • Gifts and hospitality policy and register; • Pecuniary interest and conflicts of interest policies and register; • Codes of conduct and ethics; • Information security policy; and • Cyber security policy. 		consideration to updating the Whistleblowing Policy to make reference to the Public Interest Disclosure Act 1998.	
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.	<p>Fraud awareness is a module on the induction program.</p> <p>Continuing professional development of CAFT staff is recorded on appraisals.</p> <p>We noted that CAFT staff are currently undertaking training in the writing of notices and also advocacy courses.</p>	N/A	N/A
E3	Making effective use of national or sectoral initiatives to detect fraud or prevent fraud, such as data matching or intelligence sharing.	<p>The Council takes part in the National Fraud Initiative, a data matching exercise run by the Cabinet Office and also takes part and contributes to the Tenancy Fraud Forum.</p> <p>The Council run its own forum called the Croydon Fraud and</p>	N/A	N/a

	Description	Current Position	Suggested Action	Responsible Officer and Deadline
		<p>Enforcement forum quarterly. This is supported by the police and other agencies.</p> <p>The Council is also a pilot site for the newly formed CIPFA London Counter Fraud Hub.</p>		
E4	<p>Providing for independent assurance over fraud risk management, strategy and activities.</p>	<p>We were contracted to conduct an independent fraud review.</p> <p>A corporate risk register is in place and is managed by the Head of Risk and Corporate Programs.</p> <p>Communication between the risk department and CAFT is good and other risks are often considered.</p>	N/A	N/A
E5	<p>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.</p> <p>Conclusions are featured in the annual governance report.</p>	<p>Management and GPAC receive quarterly reports on latest cases and statistics.</p> <p>The Annual Governance Statement makes reference to the Council's anti-fraud activities.</p>	N/A	N/A