

**WEST LANCASHIRE BOROUGH COUNCIL  
COUNTER FRAUD AND CORRUPTION PLAN**

This plan summarises key measures that will be put in place to prevent and detect fraud, bribery and corruption and to take effective action against any attempted or actual fraudulent act, but is not a comprehensive list of all the procedures that are in place.

	<b>Main means to achieve effectiveness</b>	<b>Target date</b>	<b>Lead Officer</b>	<b>Further action required</b>
<b>FRAUD REFERRALS &amp; WHISTLEBLOWING</b>				
Improve fraud referral	Circulate anti fraud, bribery and corruption policy to all staff and Members	October 2013	BT	
Improve fraud referral	Circulate Anti Money Laundering Policy and Whistleblowing Code to all staff and Members	March 2014	BT	
Referrals from other agencies	Through partnership working with other agencies Links and protocols	Annual review	IAM TM ADHR	Develop links through the National Fraud Initiative for data matching and through the National Anti-Fraud Network for intelligence sharing.
<b>FRAUD INVESTIGATION</b>				
External data matching	Timely response to NFI data matches Compliance with national reporting requirements	Ongoing	IAM	Regular full participation in NFI in accordance with national guidance, and reports returned in accordance with timetable.
<b>DETERRENCE / PUBLICITY</b>				
Reported publicity	Investigation activity and outcomes, including prosecutions, publicly reported via press releases and website	Ongoing	Relevant Manager	Liaison with Communications and Consultation Unit in particular in relation to the updated Benefit Fraud Sanctions and Prosecution Policy
Counter-fraud culture	Put updated corporate Counter Fraud plan in place	October 2013	DSH	Maintain and develop corporate consideration of fraud and corruption issues

**APPENDIX 2**

	<b>Main means to achieve effectiveness</b>	<b>Target date</b>	<b>Lead Officer</b>	<b>Further action required</b>
<b>PARTNERSHIP WORKING</b>				
Partnerships and links with other external agencies	To undertake joint working	Annual Review	IAM	See referrals from other agencies above but contact with other organisations also established e.g. Serious Organised Crime Agency for Money Laundering reporting.
<b>FRAUD AWARENESS TRAINING</b>				
Fraud awareness for new staff	Review fraud, bribery and corruption details in the induction material for new staff and ensure it is up to date	March 2014	BT	Review and development of existing arrangements in liaison with HR
Fraud awareness training for relevant staff	Utilise the fraud awareness e-learning training developed by the National Fraud Authority	Ongoing	BT	
<b>KEY ISSUES</b>				
Review of current arrangements to identify areas for improvement	Completion of Fraud and Corruption Self Assessment Checklist	Annual review	DSH	
Monitoring and review of this action plan	Annual report to Audit and Governance Committee	Ongoing	BT	
Payroll controls	Procedures in place Annual internal audit review	Annual review	TM IAM	Check compliance with and effectiveness of existing procedures
Recruitment procedures	Appropriate counter-fraud checks are already in place	Annual Review	TM IAM	Check compliance with and effectiveness of existing procedures
<b>REPORTING</b>				
Audit and Governance Committee	Receive regular reports on counter-fraud arrangements	Ongoing	BT	Regular reporting of issues to Audit and Governance Committee
Audit Commission Annual Fraud and Corruption survey	Report on numbers and types of fraud and emerging issues	May 2014	BT	

	<b>Main means to achieve effectiveness</b>	<b>Target date</b>	<b>Lead Officer</b>	<b>Further action required</b>
Portfolio holder	Receive regular reports of counter fraud activity	Ongoing	IAM BT	Regular reporting

**NOTE**

This plan does not include measures in relation to Revenues, Benefits and IT Services which are considered through a separate process

**Lead Officers**

BT           Borough Treasurer  
IAM         Internal Audit Manager  
ADHPM     Assistant Director Housing and Regeneration  
TM          Transformation Manager  
DSH         Heads of Service