

**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.

	Main means to achieve effectiveness	Target date	Lead Officer	Further action required
FRAUD REFERRALS & WHISTLEBLOWING				
Improve fraud referral	Circulate Anti-fraud, bribery and corruption policy to all staff and Members	Every time reviewed	BT	
	Circulate Anti Money Laundering Policy and Whistleblowing Code to all staff and Members	Every time reviewed	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.
FRAUD INVESTIGATION				
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.
DETERRENCE / PUBLICITY				
Reported publicity	Investigation activity and outcomes, including prosecutions, publicly reported via press releases and website	Ongoing	Relevant Manager	Liaison with Communications and Consultation Unit
Counter-fraud culture	Put updated corporate Counter Fraud plan in place	Ongoing	DSH	Maintain and develop corporate consideration of fraud and corruption issues

APPENDIX 2

	Main means to achieve effectiveness	Target date	Lead Officer	Further action required
PARTNERSHIP WORKING				
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. National Crime Agency for Money Laundering reporting.
FRAUD AWARENESS TRAINING				
Fraud awareness for new staff	Ensure fraud, bribery and corruption details in the induction material for new staff is kept up to date and accurate		BT	
Fraud awareness training for relevant staff	Investigate use of fraud awareness e-learning training material	Ongoing	BT	
KEY ISSUES				
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
REPORTING				
Audit and Governance Committee	Receive regular reports on counter-fraud arrangements	Ongoing	BT	Regular reporting of issues to Audit and Governance Committee
TEICCAF Annual Fraud and Corruption survey	Report on numbers and types of fraud and emerging issues	Annual	BT	

	Main means to achieve effectiveness	Target date	Lead Officer	Further action required
Portfolio holder	Receive reports of counter fraud activity as and when required	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
ADHR Assistant Director Housing and Regeneration
TM Transformation Manager
DSH Heads of Service