

SOUTH HAMS DISTRICT COUNCIL

NAME OF COMMITTEE	Audit Committee
DATE	27th September 2012
REPORT TITLE	Fighting Fraud Locally and the National Fraud Initiative - Checklists
Report of	S.151 Officer, and Chief Internal Auditor
WARDS AFFECTED	All

Summary of report:

The purpose of this report is to inform members of the position of the Council against the checklists included in the following documents:

- National Fraud Authority's strategy 'Fighting Fraud Locally'; and
- Audit Commission publication 'The National Fraud Initiative (Council members' briefing)' (May 2012).

The checklists included in these documents have been completed with the Council's responses at Appendices A and B. They demonstrate that the Council has the appropriate anti fraud arrangements in place and take the NFI seriously. However, for 2013/14 the Chief Internal Auditor will make some resources available for specific counter fraud work.

Financial implications:

None, within existing budgets.

RECOMMENDATIONS:

That the Audit Committee RESOLVES to consider and note the position of the Council against the checklists attached at Appendices A and B.

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1. National Fraud Authority – Fighting Fraud Locally

- 1.1 For several years the Audit Commission has published 'Protecting the Public Purse – Local Government Fighting Fraud' (September 2009 and October 2010), and the related checklist covering the Council's anti fraud arrangements has been presented to the Audit Committee annually (latest April 2012).
- 1.2 At the June Audit Committee, the Chairman advised members that he had received and read the National Fraud Authority's paper Fighting Fraud Locally – The Local Government Fraud Strategy. Members agreed that the Chief Internal Auditor be asked to complete the checklist attached to the Strategy for the September 2012 Audit Committee.
- 1.3 The document calls for the adoption of a tougher approach to tackle fraud against local authorities organised around the three themes of Acknowledge, Prevent and Pursue. The approach demands a new partnership between central and local government and suggests that local government must recognise the cross boundary nature of fraud and adopt the best practice identified throughout this document to tackle the highest fraud risks, whilst central government needs to create the right environment to enable local authorities to protect public funds through the creation of a positive incentive regime, the removal of barriers to information sharing and by conducting a review of the use of powers by local authorities and how they could be harnessed more effectively.
- 1.4 At the same time as unprecedented change to the delivery of local services and increased risk, the counter fraud environment is being fundamentally altered. The abolition of the Audit Commission, the changes proposed to local auditing arrangements and the creation of a single fraud investigation service to tackle benefit fraud will considerably alter current fraud governance arrangements. These factors suggest that this is the time to put forward a new and tougher approach to tackle fraud against local government and introduce new arrangements to ensure that local government has a resilient response to the changed conditions.
- 1.5 If the only impact this strategy had was to encourage the wider use of such good practice millions of pounds would be saved. However, that is not the limit of our ambition.
- 1.6 Fighting Fraud Locally outlines a strategic approach that, if adopted across local government, will not only enable local authorities to become better protected from fraud but also contribute to the nation's ability to detect and punish fraudsters. The new approach will strengthen the counter fraud response across local government and will result in more fraudsters being caught, more fraud prevented and more money returned to authorities.
- 1.7 By using the free tools provided (one of which is the checklist at Appendix A of this report), the strategy says that local authorities will:
 - Be able to estimate the level of individual fraud loss to their Council and understand their fraud risk and use this information to target their resources more efficiently.

- Be able to establish their resilience to the fraud threats and assess themselves against a checklist for what arrangements they should have in place to tackle fraud (Appendix A).
- Prevent more fraud by having access to a good practice bank of tried and tested methods.
- Have greater support through accessing an online technical advice service and a peer review process of fraud experts.
- Establish partnership arrangements more easily through using the templates held in the good practice bank.
- Be able to cost effectively create an anti-fraud culture through using the free fraud awareness training.

1.8 The public expects local authorities to be accountable for protecting public money and to operate in a transparent manner. To this end there needs to be effective systems for ensuring that anti-fraud arrangements are in place and working. Fraud is a common threat and requires common solutions and a common approach. Therefore local authorities need to adopt consistent practices and collaborate with each other and with other agencies, particularly to tackle cross authority attacks.

1.9 The best fraud fighters are the staff and clients of local authorities. To ensure that they are supported to do the right thing a comprehensive anti-fraud culture needs to be maintained, including clear whistle-blowing arrangements.

1.10 At present, the Council has a dedicated benefits fraud team which carries out counter fraud work in relation to benefit claims, but general counter fraud work is provided through Internal Audit's audit plan and reviews of the governance and control framework. In response to the NFA's strategy and checklist, the Chief Internal Auditor will redirect some of the resources in next year's plan to specific counter fraud work.

2. National Fraud Initiative (NFI)

Audit Commission

2.1 At the Audit Committee Workshop in June 2012, members confirmed that they would like more information on the National Fraud Initiative (NFI) in response to the Audit Commission's council members briefing document of May 2012

2.2 Since 1996, the Audit Commission has run the NFI data matching exercise every two years, helping to identify nearly £939 million of fraud, overpayments and error across England, Scotland, Wales and Northern Ireland. Of this total, £813 million has been detected in England.

2.3 Following the announcement, in August 2010, of its intention to abolish the Audit Commission, the Government has confirmed it intends to continue the NFI. The Commission will work closely with the Department for Communities and Local Government and other stakeholders to secure the most appropriate home for the NFI. While the Commission retains oversight of the NFI it will continue to develop the NFI to address emerging fraud risks, with an increasing focus on fraud prevention.

Running the NFI

2.4 Some 1,300 participating organisations from across the public and private sectors provide data, and key data sets are provided by government departments and other national agencies. Participants include all local councils, police authorities, and fire and rescue authorities and local NHS bodies, who are required by law to provide data for the NFI. A number of other public sector and private sector bodies also participate on a voluntary basis.

Legal Framework and Security

2.5 The NFI works within a strong legal framework, including the Data Protection Act 1998, which protects individuals' personal data.

2.6 Datasets are transferred by participants to the Audit Commission via a secure NFI website using an electronic transfer process which encrypts data on upload. All the matches are provided back to participants using the same secure tool. Access to the tool and NFI matches is controlled by secure password, and strict controls exist to ensure access is only provided to authorised individuals.

2.7 The Council's systems include Fair Processing statements to users that contribute to the NFI remaining within the Data protection Act.

The NFI at South Hams District Council

2.8 Datasets are provided to the NFI every two years, the most recent being October 2010 and will be due again in October 2012. Datasets were provided for Benefits, Payroll, Creditors, Licensing etc. The matches are returned in late winter ready for review to commence.

2.9 Through accessing the NFI website for the Council, officers are able to review 52 match types between these datasets. Of the 52 match types, the range of individual investigations per match type is 1 to 676 with a total of 3088 individual matches to be investigated.

2.10 Where a match is found it indicates that there is an inconsistency that requires further investigation by the body. The investigation may detect instances of fraud, over or under payments, and other errors.

2.11 At the date of this report, **2505 matches had been investigated and cleared**, with some work still continuing on others e.g. Council Tax Rising 18s.

2.12 **Cases of fraud identified numbered 2, in addition to 30 errors (total value together £40,999.08).** The match types with the most error were 'Housing Benefit Claimants to Student Loans' with 7 errors (total £21,640.58) and 'Housing Benefits to Pensions' with 1 error and 1 fraud (total £5,443.72). The amounts are recoverable from the claimants using the normal benefit recovery routes.

2.13 The appropriate action has been taken for the fraud and error cases and includes a court case and caution for the two fraud cases in line with the Council's approved Benefits Fraud Prosecution and Sanction Policy, and seeking to recover as much of the remainder as possible.

2.14 The above demonstrates that the Council takes the NFI seriously and a lot of work is undertaken by officers in preparing and sending the required data, as well as investigating the results.

2.15 The checklist included in the Audit Commission's briefing to members has been completed by the Chief Internal Auditor with the Benefits Fraud Manager and appears at Appendix B of this report.

3. LEGAL IMPLICATIONS

3.1 Statutory powers: Accounts and Audit Regulations 2003, 2006, 2011.

4. FINANCIAL IMPLICATIONS

4.1 None, within existing budgets.

5. RISK MANAGEMENT

5.1 The risk management implications follow this table:

Corporate priorities engaged:	All
Statutory powers:	Accounts and Audit Regulations 2003
Considerations of equality and human rights:	No specific equality and human rights issues arising from this report.
Biodiversity considerations:	No specific biodiversity issues arising from this report.
Sustainability considerations:	No specific sustainability issues arising from this report.
Crime and disorder implications:	No specific crime and disorder issues arising from this report.
Background papers:	Audit Commission report: Protecting The Public Purse 2011 (Fighting Fraud against Local Government); The Council's Anti Fraud, Corruption & Bribery Policy and Strategy 2011; Benefit Fraud Prosecution and Sanction Policy; Fraud, Corruption & Bribery Response Plan; and Confidential Reporting (Whistle Blowing) Policy
Appendices attached:	Appendix A: Completed checklist from Protecting The Public Purse 2011 (Fighting Fraud against Local Government)

STRATEGIC RISKS TEMPLATE

No	Opportunity Title	Opportunity Description	Inherent risk status				Mitigating & Management actions	Ownership
			Impact of negative outcome	Chance of negative outcome	Risk score and direction of travel			
1	Demonstrating zero tolerance of fraud.	Communicating the Anti-Fraud stance to members, officers and the public may deter those that consider that an attempted fraud is work risking.	-	-	-	↔	The Council demonstrates its commitment to an Anti-Fraud culture, by the regular review, updating and approval of an Anti Fraud Strategy. Strategy.	Chief Internal Auditor
2	The Council's response to suspected fraud is documented	Investigations are commenced promptly after suspicions are aroused.	-	-	-	↔	The approach to investigating suspected fraud is clearly laid out in the Council's Fraud And Corruption Response Plan appended to the Anti-Fraud and Corruption Strategy. Early liaison with the police, where appropriate is clearly stated in the Council's Fraud And Corruption Response Plan.	Chief Internal Auditor
3	Preventative measures are in place	Preventative measures are in place, including a system of internal controls which are regularly reviewed.	-	-	-	↔	Controls are regularly reviewed by managers and Internal Audit on a risk basis, with vulnerability to fraud being a key part of the audit risk assessment.	Chief Internal Auditor

No	Risk Title	Risk Description	Inherent risk status				Mitigating & Management actions	Ownership
			Impact of negative outcome	Chance of negative outcome	Risk score and direction of travel			
4	Risk of fraud.	Risk of fraud or corruption being perpetrated on the Council.	2	2	4	↔	Preventative measures are in place. These include a system of internal controls which are regularly reviewed, and a zero tolerance policy which is communicated to members, officers, stakeholders and the community. The risk of fraud appears in the Council's risk register.	Chief Internal Auditor
5	Reporting suspected fraud is encouraged.	Fraud or corruption is not identified at an early stage.	2	2	4	↔	The Council's Confidential Reporting Policy (whistle blowing) encourages members, officers and the public to report suspected fraud without fear of reprisals. Internal control measures are in place.	Chief Internal Auditor
6	A professional approach to fraud investigation	Suspected fraud or corruption is not investigated in a sound professional way.	2	2	4	↔	Only appropriately trained officers are appointed to investigate suspected fraud.	Chief Internal Auditor

Direction of travel symbols ↓ ↑ ↔

NFA Checklist Item	Council's Arrangements	Action Required
<p>The Council has made a proper assessment of its fraud and corruption risks and has an action plan to deal with them and regularly reports this to its senior board and its members.</p>	<p>Outside of benefits fraud, for which there is a dedicated team, areas susceptible to fraud are assessed when the 5 Year and Annual Internal Audit Plans are drawn up and prioritised.</p> <p>Services risk registers also highlight areas that are susceptible to fraud. Heads of Services are asked to confirm controls are in place and that they are unaware of any fraudulent activity in their annual assurance statement for the System of Internal Control.</p>	<p>The Chief Internal Auditor will bring together a centralised list of fraud risks as part of the Internal Audit team's counter fraud work.</p>
<p>The Council has undertaken an assessment against the risks in Protecting the Public Purse and has also undertaken horizon scanning of future potential fraud risks</p>	<p>A report on "Protecting the Public Purse" is presented to Audit Committee annually (most recently April 2012), with an assessment of the effectiveness of the Council's anti fraud arrangements.</p>	<p>Horizon scanning for future potential fraud risks will be included in the report for 2013.</p>
<p>There is an annual report to the Audit Committee or equivalent detailing an assessment against the local government strategy Fighting Fraud locally and this checklist</p>	<p>Reference was made to NFA Strategy Fighting local Fraud in the Audit Commission's paper Protecting the Public Purse but was not available at the time of presenting the Audit Commission's checklist to the Audit Committee.</p>	<p>The annual report to the Audit Committee on the Council's anti fraud arrangements will include also the NFA's Fighting Local Fraud checklist.</p>
<p>There is a counter fraud and corruption strategy applying to all aspects of the council's business which has been communicated throughout the council and this has been acknowledged by those charged with governance</p>	<p>The Council's Anti Fraud, Corruption and Bribery Policy and Strategy states that the Council is committed to discouraging, preventing and detecting fraud and corruption where attempted on, or from within, the Council's organisation.</p>	<p>None</p>
<p>The Council has arrangements in place that are designed to promote and ensure probity and propriety in the conduct of its business</p>	<p>The Council has a number of policies and strategies already in place to promote and ensure probity and propriety in the conduct of its business.</p> <p>An annual Review of the Code of Corporate Governance is considered by the Audit Committee and any significant issues reflected In the Annual Governance Statement.</p>	<p>None</p>
<p>The risk of fraud and corruption is specifically considered in the Council's overall risk management process</p>	<p>The risk of fraud has been recorded in the Council's risk register.</p>	<p>None</p>

Voluntary Checklist Item	Councils Arrangements	Action Required
Counter fraud staff are consulted to fraud proof new policies, strategies and initiatives across Departments and this is reported upon to Committee	<p>The Council does not have the resources for dedicated counter fraud staff, outside of the Benefits team. Other counter fraud work is carried out by Internal Audit.</p> <p>The S.151 Officer is consulted on all new policies and has regard to the risk of fraud in her review.</p>	None
The Council has put in place arrangements to prevent and detect fraud and corruption and a mechanism for ensuring this is effective and this is reported to Committee	<p>Internal audit are alert to the potential for fraud with each audit carried out.</p> <p>The Council's Anti Fraud, Corruption and Bribery Policy and Strategy is supported by a Response Plan, and Confidential Reporting Policy which allows staff to "whistleblow".</p> <p>Any actual, suspected or alleged fraud is reported to Audit and Accounts Committee, as are the results of the Audit Commission annual survey.</p>	None
<p>The Council has put in place arrangements for monitoring compliance with standards of conduct across the council covering</p> <ul style="list-style-type: none"> • Codes of conduct including behaviour for counter fraud, anti- bribery • Register of interests • Register of gifts and hospitality 	<p>The following are in place and confirmed in the annual compliance review of the Code of Corporate Governance:</p> <ul style="list-style-type: none"> • Employee and member code of conduct • Register of interests • Register of Gifts and Hospitality 	None
The Council undertakes recruitment vetting of staff prior to employment by risk assessing posts and undertaking checks to prevent potentially dishonest employees from being appointed	<p>Candidates that are selected for interview are required to provide two forms of identity.</p> <p>Referees provided by the applicant are written to by the Council.</p> <p>Evidence of the right to work in the UK via a British passport is required or other relevant documentation.</p> <p>Successful applicants are required to provide a National Insurance number.</p> <p>The Council's Agency contract requires the agency to undertake the same recruitment checks that the Council itself undertake.</p> <p>Our Payroll audit of 2011/12 confirmed that evidence of eligibility to work is obtained but not recorded in the exact terms expected by the Immigration, Asylum and Nationality Act 2006. Officers agreed to review and amend the procedures as required.</p>	Routine follow up of the 2011/12 audit will confirm that the agreed amendments have been implemented. The results will be reported to the Audit Committee.

Voluntary Checklist Item	Councils Arrangements	Action Required
Members and staff are aware of the need to make appropriate disclosures of gifts, hospitality and business. This is checked by auditors and reported to Committee.	This is set out in the Codes of Conduct, and until recently was reported to the Standards Committee.	Reporting procedures are under review following adoption of the new Codes of Conduct, in line with the Localism Act.
There is a programme of work to ensure a strong counter fraud culture across all department and delivery agents led by counter fraud experts	Only as a routine part of the duties of Internal Audit and Benefits Fraud teams.	The Chief internal Auditor to include days in future audit plans specifically for counter fraud work.
Successful cases of proven fraud/corruption are routinely publicised to raise awareness.	Internally and through the local media as appropriate and in line with the Response Plan and the approved Benefit Fraud Prosecution and Sanction Policy.	None
There is an independent Whistleblowing Policy which has been measures against the BSI, which is monitored for take up and it can be shown that suspicions have been acted upon without internal pressure.	The Confidential Reporting Policy has been approved by members, is promoted internally including on the Intranet, and externally on the Council's website. The Policy protects individuals who report matters in an honest way.	None
Contractors and third parties sign up to the Whistleblowing Policy and there is evidence of this. There is no evidence of discrimination for those who whistleblow.	The Confidential Reporting Code covers stakeholders and the community.	None
Fraud resources are assessed and adequately resourced.	Counter fraud, outside of Benefits, is part of the Internal Audit remit and an element of fraud response is part of the Internal Audit annual plan through the contingency days.	None
There is an annual fraud plan which is agreed by committee and reflects resources mapped to risks and arrangements for reporting outcomes. This plan covers all areas of the Council's business and includes activities undertaken by Contractors and third parties or voluntary sector activities.	There is no specific annual fraud plan. However, the Internal Audit annual plan does provide cover for all areas of Council activity and is agreed by the Audit Committee.	In including days in future Internal Audit Plans for specific counter audit activities, a plan will be devised to direct the related work in an effective way. This will be reported to the Audit Committee.
Statistics are kept and reported by the Fraud team which cover all areas of activity and outcomes, benchmarking where appropriate.	Statistics are maintained of all work relating to NFI, investigations carried out and referrals made. These are reported to line managers and the Audit Commission and audit Committee via the Annual Fraud Survey.	None
Fraud officers have unfettered access to premises and documents for the purposes of counter fraud investigation	The Constitution (Financial Procedure Rules) gives Internal Audit access to all premises and documents held by the Council.	None

Voluntary Checklist Item	Councils Arrangements	Action Required
There is a programme to publicise fraud cases internally and externally which is positive and endorsed by the Council's Communication Team	Any publicising of fraud cases would be carried out with the assistance of the Council's Public Relation team.	None
All allegations of fraud and corruption are risk assessed	All Internal Audit is preceded by a risk assessment and this includes allegations of fraud.	None
The written fraud response plan covers all areas of counter fraud work; prevention, detection, deterrence, investigation, sanctions and redress	The written fraud response plan covers all areas of counter fraud work; prevention, detection, deterrence, investigation, sanctions and redress and is published on the Council's Intranet.	None
The fraud response plan is linked to the Audit Plan and is communicated to senior management and members	The annual IA plan (approved by members) includes provision for auditors to carry out or assist with fraud investigations. The Response Plan states that Internal Audit would normally be appointed to investigate allegations of fraud, outside of Benefits.	None
Asset recovery and civil recovery is considered in all cases and is linked to a written sanctions policy	The Response Plan includes the requirement for the investigating officer to calculate any loss and the S.151 Officer to consider recovery of loss including through civil action and/or pensions.	None
There is a zero tolerance approach to fraud and corruption that is reported to Committee	The Policy, Strategy, Response Plan, and linked Disciplinary Policy, reflects the Council's zero tolerance approach to Fraud, Corruption and Bribery.	None
There is a programme of proactive counter fraud work which covers risks identified in assessment	Internal Audit Plans and the work of the Benefit Fraud Team.	Discussed above, Internal Audit to include some time in plans specifically for counter fraud work.
The Fraud team works jointly with other enforcement agencies and encourages a corporate approach and co-location of enforcement activity	The Benefits Fraud Team have working arrangements and monitoring meetings with the Department for Work and Pensions (DWP), both Exeter and Plymouth offices. There is a dedicated fraud hotline is available to the public who can anonymously give information about any fraudulent claimant - the Council investigates every report. Benchmarking is also undertaken with other local authorities of sanctions taken.	None

Voluntary Checklist Item	Councils Arrangements	Action Required
<p>The Council shares data across its own departments and between other enforcement agencies</p>	<p>Full use is made of the NFI and in addition the Department for Work and Pensions Housing Benefits Matching Service on a monthly basis.</p> <p>Reference is also being made to a private sector company that helps businesses to manage credit risk and prevent fraud.</p> <p>Internal Audit shares data with neighbouring Council teams relating to fraud and the system weaknesses that allowed the fraud to be perpetrated.</p> <p>The Council receives alerts from the National Fraud Agency as this are passed to the relevant service to ensure that the Council's process do not make it vulnerable to similar.</p>	<p>None</p>
<p>Prevention measure and projects are undertaken using data analytics where possible</p>	<p>As above</p>	<p>Internal Audit to include some counter fraud Computer Assisted Audit techniques (CAATs).</p>
<p>The Council actively takes part in the NFI and promptly takes action</p>	<p>The Council takes part in the Audit Commission NFI. Action is taken and outcomes are reported to the Audit Committee by exception through normal reporting channels where appropriate.</p>	<p>See also Appendix B of this report.</p>
<p>There are professionally trained staff for counter fraud work trained by professionally accredited trainers using the Counter Fraud Accreditation Board. If other staff undertake counter fraud work they must be trained in this area.</p>	<p>All staff operating counter fraud activities are appropriately trained. Training is identified through the Council Appraisal System.</p>	<p>None</p>
<p>The counter fraud team has adequate knowledge in all areas of the Council or is trained in these areas.</p>	<p>Internal Audit has adequate knowledge of all areas of the Council.</p>	<p>None</p>
<p>The Counter Fraud Team has access where appropriate to specialist staff for;</p> <ul style="list-style-type: none"> • Surveillance; • Computer forensics; • Asset recovery; and • Financial investigations 	<p>If suitably trained and experiences staff are not available internally, external specialists would be used either via partnership, other Councils or procured.</p>	<p>None</p>
<p>Weaknesses revealed by instances of proven fraud and corruption are looked at and fed back to Departments to fraud proof systems.</p>	<p>After each fraud investigation, a report is sent to management highlighting areas where procedures require amendment to reduce or remove the risk of further fraud.</p>	<p>None</p>

Question	Answer/Action Required
<p>The NFI in our council</p> <ul style="list-style-type: none"> • What is the role/post of the senior responsible officer accountable for the NFI in our council? • Do we have a lead elected member for counter-fraud activity, including the NFI? • What role does our audit committee play? • How are other elected members or non-executive members kept informed of the NFI? • What governance arrangements do we have in place to ensure the organisation achieves the best possible outcomes from the NFI? • Who decides and monitors this approach? • How is the NFI reflected in the governance training and development provided for officers and board/elected members? 	<p>The Council's Benefit Fraud Manager acts as Co-ordinator and for the purpose of NFI only reports to the Head of Finance and Audit (S.151 Officer). No</p> <p>The Audit Committee has had little involvement until this report. The total fraud reported in the Audit Commission's Annual Return is presented to the Audit Committee.</p> <p>The Council's Benefit Fraud Manager acts as co-ordinator and key contact and ensures that the datasets are supplied to NFI by ICT officers and that the relevant services review and investigates the identified matches. Long standing approach approved by the former S.151 Officer (left July 2011) and continued by the current officer. Internal Audit review the process from time to time. General Anti Fraud training only is provided but the anti fraud policy makes reference to NFI.</p>
<p>Maximising results</p> <ul style="list-style-type: none"> • What resources do we invest in the NFI? • What were our outcomes from the most recent NFI? • Are we ensuring we maximise the benefits of the NFI – for example, following up data matches promptly, recovering funds and prosecuting where possible? • What assurances have we drawn about the effectiveness of internal controls and the risks faced by the organisation? • What changes have we made as a result? • Do those responsible for the NFI in the council feel they get appropriate support from other managers in the council when investigating matches? 	<p>As discussed in the report above, with over 2500 matches investigated the Council invests a reasonable amount of staff time into NFI, from the co-ordinator to staff in certain services that investigate each individual match. The outcomes are described in the report above, and are thought to be diminishing with recent NFI rounds.</p> <p>Yes</p> <p>With relatively few outcomes compared with the matches investigated, the NFI provides some assurance over the System of Internal Control at October 2010 (date of the datasets). System changes have not been made directly as a result of the NFI, but any weaknesses identified would be separately assessed and the appropriate action taken.</p> <p>Yes</p>
<p>Broadening our council's engagement with the NFI</p> <ul style="list-style-type: none"> • Are we taking advantage of the opportunity to suggest and participate in NFI pilot data matching? • Have we considered how we could use the new flexible batch and real-time matching services? 	<p>No, because much of the data included is already received the Department for Work and Pensions (DWP) monthly referral.</p> <p>Yes, the Council's Benefit Fraud Manager would like to use the two data matches mention in the body of the report in the intervening years at a cost of £300 per data set.</p>
<p>Data Security</p> <ul style="list-style-type: none"> • What is our strategy/policy for data security? • Is there any specific reference to the NFI data security in the strategy? 	<p>The ICT Security Policy is in place and covers the secure transmission of data, but does not specifically refer to the NFI.</p>

Question	Answer/Action Required
<p>The NFI fit with wider counter-fraud policies</p> <ul style="list-style-type: none"> • How does the NFI influence the focus of our counter-fraud work? • Does our counter-fraud policy include reference to the council's participation in the NFI? • Do we publicise the outcomes from the NFI? How does the NFI influence how and what we communicate to the public about our approach to counter-fraud? • Are the outcomes from the NFI used to inform our wider decision making – for example, internal audit risk assessments, data quality improvement work or anti-fraud and corruption policy? 	<p>The NFI has very little influence on benefits counter fraud work, as the NFI is a counter fraud tool in its own right.</p> <p>Yes</p> <p>This report for the first time in general terms, although the court case relating to one of the fraud cases was reported in the local paper.</p> <p>Not at present.</p>