

AUDIT COMMITTEE
25 SEPTEMBER 2014
CORPORATE FRAUD

Report from: Internal Audit

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Summary

To inform Members of matters relating to corporate fraud, including outcomes of investigations and fraud referrals received by Audit Services. This report does not include details of any investigations which need to be reported as exempt items.

1. Budget and Policy Framework

1.1 It is in the remit of the Audit Committee to take decisions regarding accounts and audit issues.

2. Background

2.1 The Anti-Fraud and Corruption Policy forms part of the Council's Constitution and sets out the council's commitment to ensuring the opportunity for fraud and corruption is reduced to the lowest possible risk.

2.2 Prosecutions, cautions and administrative penalties relating to benefits and council tax reductions are reported in **Annex A**, along with a year on year comparison of identified overpayments with the prior two years. This report relates to Quarter 1 of 2014/15.

2.3 Audit Services are responsible for investigating all suspected fraud perpetrated against the council by employees and contractors. **Annex B** provides an update on internal fraud and irregularity investigations. The report includes a record of any control weaknesses identified and management actions put in place to strengthen existing arrangements.

3. Disciplinary issues emanating from investigations

3.1 To ensure anonymity is maintained staff investigations relating to External Benefit Fraud will continue to be included on the External Investigations Report at Annex A. This report will not identify the offender as a member of staff.

3.2 Where Medway staff are subject to disciplinary action, as a consequence of an Audit Services investigation, details will be provided to Audit Committee as an

exempt item. Generally the disciplinary action would be reported once the criminal matter is concluded.

4. Fraud Resilience Strategy 2014/16 - Update

- 4.1 The Fraud Resilience Strategy (FRS) was presented to the Audit Committee in March 2014, including a proposed action plan for 2014 –16. Also presented was a document mapping the planned internal audits of 2014/15 to this proposed list of activities. The proposals built on improvements implemented over the previous two years and was extended to include additional service areas.
- 4.2 The FRS covers a number of specific service areas but also covers work related council-wide arrangements, including:
- Increasing fraud awareness across the council – with fraud risk being considered as part of service plans developed for 2014/15.
 - Further review of the current protocols for handling internal investigations.
 - Monitoring the impact and use of the fraud hotline established in 2013.
 - Maximising the use of data matching for identifying potential fraudulent activity.
- 4.3 Where Audit Services identify weaknesses in the control environment, either as part of the fraud resilience work or thought the undertaking of individual investigations, the proposed improvements for strengthening controls are discussed with management to ensure the action they take is proportionate to the risk.
- 4.4 The strategy is presented to Audit Committee biennially, with six monthly updates on progress. **Annex C** provides the first six monthly update.

5. Department for Communities and Local Government “Counter Fraud Fund” and the “Memorandum of Understanding between Kent Council, Kent Police Authority, Kent Fire Authority and Kent Billing Authorities for tackling Council Tax and Business Rate fraud and error”

- 5.1 On 4 July 2014 DCLG launched a £16m Counter Fraud Fund. Local Authorities were invited to make applications with innovative ways to tackle the estimated £2bn of local government fraud.
- 5.2 Kent Finance Officers agreed that Kent County Council should head up a partnership bid to set-up a data warehouse to enable better and speedier access to information when checking eligibility for discounts and exemptions. This will also provide significant data matching opportunities across a number of high value council services, including Local Business Rates and Social Care.
- 5.3 Part of the evidence for the KCC led bid was a Memorandum of Understanding (MOU) which is being developed to identify a baseline for the District Council’s responsibilities and allow for partnership funding opportunities, with the intention of maximising the yield from local taxes. Medway has requested inclusion in the MOU in order to access funding from the three major emergency service preceptors.
- 5.4 The deadline for submission of application was 5 September. Successful applicants will be notified by the end of October, with the first payment expected to be made in the third quarter of 2014/15.

- 5.5 DCLG encouraged multiple applications for funding. Medway has therefore joined 37 authorities in a further bid submission for a Smartphone Counter Fraud App. This would be supplied to the authority at no cost for two years after which we could choose to retain at a cost of £2,000 per annum.
- 5.6 The two applications, if successful, will immediately support the plans of the Fraud Resilience Strategy. In the long term it would provide further partnership opportunities with external agencies such as the police and registered social landlords.

6. Data interrogation

- 6.1 Internal Audit currently use a data interrogation tool, IDEA, provided through a Software supplier (AuditWare). The Kent Audit Group, led by Medway, has been working with the supplier to identify ways that Local Authorities might best utilise IDEA in the process of not only individual audits and investigations, but more generally for the purposes of fraud resilience and by management more generally.
- 6.2 The review is looking at how the software can be used both within individual Local Authorities and also between Local Authorities, with the intention of maximising the interrogation of shared data across the Kent Authorities.
- 6.3 The project will be progressed once the necessary data sharing protocols are satisfied.

7. Risk Management, Financial and Legal implications

- 7.1 There are no risk management, financial or legal implications arising from this report.

8. Recommendations

- 8.1 Members are asked to note progress in investigating fraud in accordance with the approved Anti Fraud & Corruption Policy.

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Background papers

Sanction Policy (revised 2006) & Anti-Fraud & Corruption Policy (updated August 2012)
Fraud Resilience Strategy 2014/16 – presented to Audit Committee March 2014

External Investigation Outcomes

Table 1 – Benefits & Council Tax Reductions / Discounts - Prosecutions completed in the 1st Quarter 2014/15
(Amounts of overpayments outstanding as at 01 September 2014)

Prosecutions					
Case ref.	Fraud Type	Fraudulent overpayment £	Period of overpayment or Evasion of liability	Court and sentence	Comment
13173 / 1056206	LT	£2,902.23 (HB/CTB) £1,501.14 (ESA)	22/10/12 – 17/03/13 18/10/12 – 14/03/13	Medway Magistrates Found guilty to 3 x offences. Sentenced to 18 month conditional discharge. £85 Costs. £15 Victim Surcharge	Department for Work and Pensions led prosecution, prosecuted by Crown Prosecution Service. Outstanding Housing Benefit overpayment totalling £4,881.90 (includes previous outstanding overpayment). Debt was being recovered from benefit entitlement at the rate of £18.25pw. Claim is currently suspended due to a change in circumstance. Recovery will recommence if / when claim reinstated.
12688 / 1055601	LT	£14,950.69 (HB/CTB) £56,249.77* (IS)	23/07/10 – 19/02/12 21/05/10 – 17/02/12	Maidstone Crown Court Found guilty of 1 x Medway offence & 1 x DWP offence Sentenced to 150hrs unpaid work. 6 Sessions of education and employment training. £60 victim surcharge and costs.	Department for Work and Pensions led prosecution, prosecuted by Crown Prosecution Service. (* In court the claimant offered a guilty plea for a reduced period of the Income Support claim, admitting her partner was resident from May 2010. The I/S O/P was originally calculated for period 22 December 2004 – 17 February 2012 at £78,820.99) The Housing Benefit overpayment of £12,780.69 remains outstanding.
12625 / 1041537	LT	£9,828.12 (HB/CTB)	21/09/09 – 06/01/13	Medway Magistrates Found not-guilty of all	Medway led investigation and prosecution. Outstanding Housing Benefit overpayment totalling

		£458.15 (I/S)	20/07/10 – 06/09/10	offences (3 x Medway and 1 x DWP). Defence made application for costs out of central funds (Legal Aid rates). Medway Council would not be held responsible to meet these costs.	£9,588.21. No current awards of DWP or Medway benefits. The debt was passed to a Collection Agency on 08 January 2014 but they were unsuccessful in collecting the balance. The debt will be now be recalled so that Medway can proceed with recovery action.
Totals (£)		£27,681.04 (HB/CTB) £58,209.06 (DWP)			

Table 2 – Benefits & Council Tax Reductions / Discounts – Cautions issued in the 4th Quarter 2013/14
(Amounts of overpayments outstanding as at 01 September 2014)

Cautions					
Case ref.	Fraud Type	Fraudulent overpayment £	Period of overpayment or Evasion of liability	Date Caution accepted	Comment
13414 / 1047769	CofC	£6,352.06 (HB/CTB/CTR)	30/09/12 – 19/01/14	27/05/14	Outstanding Housing Benefit overpayment is £5,039.61. Customer is maintaining arrangement to repay at the rate of £152.00 per month.
13366 / 1012860	CofC	£2,659.72 (HB)	01/04/11 – 15/01/14	27/05/14	Outstanding Housing Benefit overpayment is £2,038.07. Customer is maintaining arrangement to repay at the rate of £10 per week.
Total		£9,011.78 (HB / CTB / CTR)			

Table 3 – Benefits & Council Tax Reductions / Discounts – Administrative Penalties issued in the 4th Quarter 2013/14

Administrative Penalties					
Case ref.	Fraud Type	Fraudulent overpayment £	Period of overpayment or Evasion of liability	Date Administrative Penalty issued	Comment
N/A	N/A	N/A	N/A	N/A	N/A

Table 4 – Non Benefit – Cautions issued in the 4th Quarter 2013/14

Cautions					
Case ref.	Fraud Type	Value of fraud £	Period of fraud / evasion of liability	Date Caution accepted	Comment
13610	Blue Badge misuse	N/A	13 February 2014	15/05/14	Misuse identified by Parking Services during patrol of council car park. Penalty Charge Notice issued at the time as the badge appeared to have been altered. Investigation established the driver was misusing the Blue Badge of a deceased friend.

Table 5 – Benefits, Council Tax Reduction and Single Person Discount overpayments identified and recorded by the Corporate Anti-Fraud Team during the 4th Quarter 2013/14 – With comparison to the same quarter in previous financial years. (The figure in brackets denotes the number of cases with identified overpayments).

Types of overpayment	4th Qtr 2011/12 £	4th Qtr 2012/13 £	4th Qtr 2013/14 £
Housing Benefit / Council Tax Benefit / Council Tax Reduction (HB/CTB/CTRS)	286,888	175,860	118,230
Single Person Discount (SPD)	0	0	475
DWP benefits	255,397	40,319	123,069
Other (e.g. Tax Credits)	0	0	0
Totals	542,285	216,179	241,774

Key: -

Clmt Claimant

LT Living together as husband & wife

WC Working & claiming

CAP Failure to declare capital

ND Non Dependent

CofC Failure to report a change in circumstances

Inc Failure to declare income

QB9 Employer prosecuted for failing to supply information requested under Social Security Legislation.

SPD Single Person discount

HB Housing Benefit

CTB Council Tax Benefit

CTR Council Tax Reduction

Note re costs – Medway no longer receives details of Costs awarded where Crown Prosecution Service undertake proceedings on behalf of DWP / Medway Council.

INTERNAL FRAUD AND IRREGULARITY INVESTIGATIONS

Audit Services are responsible for undertaking investigations into possible fraudulent activity by members of council staff and contractors. Referrals requiring investigation by Audit Services are received from managers across the council or through the whistleblowing arrangements. In addition some investigations arise as a direct result of internal audit work.

Audit Services conduct an initial assessment of the case in order to determine whether an investigation is required. In some instances the referral will require nothing more than the provision of advice to management, who may be required to investigate the matter further, in compliance with the council's disciplinary policy. In some cases Audit Services undertake a full investigation, which may result in disciplinary and/or criminal proceedings.

There is an investigation protocol between Audit Services and HR which sets out how the respective roles of the two teams when undertaking investigations into suspected employee fraud. The protocol was agreed in 2013 and has resulted in an increased number of referrals to Audit Services.

The table below sets out the completed internal fraud and irregularity investigations undertaken, and advice provided, since the last report presented to Audit Committee (excluding those cases which have to be reported as a restricted item, in line with Data Protection Act requirements). The table includes a summary of control weaknesses identified and management actions agreed.

Referral	Audit Services Involvement	Finding	Control Improvements
<u>Staff bicycle loan</u> – Member of staff reported that a colleague had been granted a bicycle loan for £1,000 but had failed to purchase the bicycle.	Advice provided to management. Evidence file produced for use in the disciplinary investigation. Review of loan	Loan application made 29 April 2013. Loan agreement signed 25 May 2013 and manual payment for £1000 transferred to employee's bank account. Employee subsequently failed to comply with the terms of the agreement by producing evidence of the purchase within 14 days. Loan repayment commenced from monthly salary. Attempts to obtain the necessary proof from the employee had been unsuccessful The officer tendered their resignation during the	We identified, as part of our review, some potential enhancements to the loan application, agreement documents and loan policy. These suggestions are being shared with HR Payroll. These enhancements, particularly around the strengthening of the staff declaration and the management checks, should help ensure that any

Referral	Audit Services Involvement	Finding	Control Improvements
	application and agreement forms.	disciplinary process, effective from 01 July 2014; at which time there was £417.60 of the loan outstanding. A final salary payment in respect of outstanding accrued leave, was offset against the outstanding loan, reducing the balance to £335.38. An invoice has been issued for the outstanding balance.	failure to use the loan as intended is identified promptly.
<p><u>Cash loss of £110 from cash-tin</u> – On 26th August the Disabled Persons Blue Badge Admin team (Hub 4C) identified the loss when they came to bank money accepted from customers attending Gun Wharf. The cash was from fixed £10 Blue Badge administration fees.</p>	Advice.	<p>The money had gone missing sometime between 8 July and the date it was reported and given the number of people who could have had access to those funds in that time it was not possible to investigate the matter fully to determine how these funds had gone missing.</p> <p>The Blue Badge Admin team had previous been advised to deposit the cash on a regular basis to prevent large sums from accruing. New procedures were agreed but not fully implemented due, in part, to changes in management personnel.</p> <p>Weak controls were identified regarding the security of the cash-tin and the destruction of expired blue badges.</p> <p>The majority of fees are paid through other methods or at other places (Community Hubs and Pay Points). Cash payments were occasionally accepted at Gun Wharf to reflect the needs of the client group.</p>	<p>As a consequence of this apparent theft new procedures have been introduced and cash payment of Blue badge fees at Gun Wharf is no longer permitted. Cheques will continue to be accepted, but a greater emphasis is placed on encouraging customers to attend Community Hubs e.g. through improved letters and telephone scripts.</p> <p>The service has agreed to put in place revised processes to ensure the security of valuables and expired blue badges.</p>

Fraud Resilience Strategy 2014 to 2016 – Action Plan Update (September 2014)

	Key Risk Areas (key at foot of table)	Audit Services actions to date
1.	Council Tax (C/T) (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Assurance provided by Council Tax 2013/14 internal Financial Audit – issued 19 June 2014. • Council Tax Fraud Referral process through Comino DMS is now embedded and working well. • NFI 2013/14 exercise (SPD to Electoral Registration) - MRBS undertook a 100% sample of matches. Review exercise is due for completion by end of September. CAFT have prioritized referrals emanating from the exercise and will evaluate the overall outcome to determine fraud resilience. • Audit Services continue to liaise with MBRS re the NFI SPD to Electoral Registration exercise, which will change from biennial to annual from February 2015. • Between 01 April and 08 September CAFT raised 21 fraud files relating to allegations of Council tax evasion through false application for discounts and exemptions. • CAFT / MRBS / Customer Contact have met and discussed the level of risk and key priorities, which include: - Review of the Sanctions Policy / Review of forms and documentation supporting applications.
2.	Housing Benefits (HB) (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Assurance provided by Housing Benefits 2013/14 internal Financial Audit – issued 30 April 2014. • CAFT continue to undertake reactive investigations based on referrals from a number of sources. During the first 5mths of 2014/15 CAFT investigations led to the identification of £269,585 in overpaid Housing Benefit / Council Tax Benefit and Council Tax Reduction. • NFI (2012/13) – CAFT completed a 100% review of Medway payroll to benefit matches which, to date, has identified £118,364 in overpaid benefits / Council Tax Reduction. • CAFT provided support and guidance to MRBS regarding non-Medway staff NFI matches. • CAFT provide MRBS and Customer Contact with regular feedback on good practice and procedural errors identified during the course of benefit investigations.

3.	Tenancy Fraud / Housing / Right to Buy (RTB) (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Assurance provided by 2013/14 Housing Rents annual internal audit – Issued 15 May 2014. • CAFT provided advice to Housing in relation to their new Tenancy Fraud Policy (issued April 2014). • Fraud referral process introduced for Housing officers, which allows for management monitoring. • CAFT granted access to Academy Housing system to allow for more effective investigations and exchange of information. • CAFT currently undertaking a small number of investigations, two of which relate to false applications for housing. • One case, generated from a Benefit referral, resulted in the recovery of a Council property. The property was re-let to a new tenant on genuine need within 2 weeks of being recovered. • CAFT provide assistance in the verification of RTB and succession applications.
4.	Local Business Rates (LBR) (new)	<ul style="list-style-type: none"> • Assurance provided by 2013/14 Local Business Rates annual internal audit – issued 19 June 2014. • CAFT have consulted with MRBS and Customer Contact to identify priorities for targeted referral work e.g. Application and verification process for the award of - Charity & Community Amateur Sports Club Relief, Unoccupied Property Relief, Small Business Rate Relief. • CAFT currently working with Planning in relation to a LBR fraud referral which identified possible planning irregularities.
5.	Free School Meals (new)	<ul style="list-style-type: none"> • CAFT met with Student Services in June to explore FRS opportunities. Agreed to defer any work until autumn 2014, due to the introduction of the free school meals for Reception / Years 1-2 which might adversely impact Pupil Premiums. • CAFT will explore data sharing opportunities between Medway departments to reduce the risk of fraud & overpayments and undertake subsequent investigations.
6.	Concessionary travel passes (new)	<ul style="list-style-type: none"> • NFI 2014/15 will match against DWP Deceased Persons records. Audit Services will support the service by providing a resource to check the data output and take appropriate action to cancel badges. (In the last exercise a total of 14 travel passes were cancelled.) • CAFT to provide consultative support and undertake investigations where required.

7.	Staff Mileage (carry forward from 2012/14 FRS actions)	<ul style="list-style-type: none"> • CAFT have engaged with Payroll services regarding a targeted review of mileage claims (to be commenced October 2014). • After completing the personal mileage claims review CAFT will review arrangements for personal mileage using council vehicles. • CAFT will undertake any subsequent investigations emanating from the two reviews.
8.	Review of safes in council offices (new)	<ul style="list-style-type: none"> • CAFT have commenced a proactive review of safes – linked to the on-going audit programme of “Payments – Local Arrangements”. • Audit Services will undertake any subsequent investigations.
9.	Discretionary Housing Payments (DHP) (new)	<ul style="list-style-type: none"> • The DHP fund for Medway for 2013/14 was £563,046. DHP awards totalled £355,618, with a £207,428 underspend. The fund has increased for 2014/15 to £598,000. MRBS are reviewing their procedures to ensure the 2014/15 fund is better utilised. MRBS have agreed for CAFT to provide advice within the new procedures around fraud prevention and detection. • CAFT will continue to investigate allegations of DHP fraud, generally identified whilst undertaking benefit investigations.
10.	Staff Vetting (carry forward from 2012/14 FRS actions)	<ul style="list-style-type: none"> • Assurance will in part be provided by the 2014/15 operational internal audit of Disclosure and Barring Service (DBS) (Part 2) which is currently in draft format. • CAFT have not yet commenced work in this area: - Current plan is to undertake a sample of new starters and recruitment into key positions from across the organisation with a consultative review of vetting arrangements. • Whilst undertaking some initial investigations CAFT reviewed documentation supporting recruitment, references and qualifications of staff. Any generic control issued identified were shared with management.

11.	Personal Budgets (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • A fraud referral process has been agreed. • CAFT have provided consultative support to management, within both Adult Social Care and Customer Contact and will continued to undertake investigations as necessary. • CAFT officers have attended training provided by Client Financial Affairs. • Direct payment data will be submitted as part of the forthcoming 2014/15 NFI exercise. Data will be matched against other bodies direct payment records, pensions, housing benefit and Amberhill data (false identity documents). Audit Services are currently liaising with management regarding the data submission and output. CAFT will undertake any subsequent investigations where potential fraud is identified.
12.	Blue badge (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • CAFT are continuing to work with Parking Services on the enforcement of Blue Badges in the Medway area. This work will be enhanced by the recent authorisation of CAFT officers to inspect and retain badges suspected of misuse / abuse. • Since April 2014 CAFT have investigated / advised on 18 allegations of Blue Badge and 6 Disabled Parking Bays misuse or abuse. • CAFT intend undertaking a proactive exercise to check a number of new and renewal applications against other Medway records (including Housing benefit and Council Tax records).
13.	Category Management (new)	<ul style="list-style-type: none"> • Internal Audit will work with management to develop a procurement governance review which can be undertaken by management and Audit Services jointly on an annual basis. • The Head of Internal Audit has reviewed and provided control advice on draft category management policies and procurement gateway documents.

14.	Corporate Credit Cards (new)	<ul style="list-style-type: none"> • Assurance provided by the 2014/15 financial audit of Corporate Credit Cards – issued 3 July 2014. • Audit Services undertake investigations as required.
15.	Taxation – Creditor Payments (new)	<ul style="list-style-type: none"> • The planned internal audit will provide assurance on arrangements, concentrating on: - <ul style="list-style-type: none"> - CIS - Consultants - VAT • Audit Services undertake investigations as required.
16.	Grant Fraud (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Assurance provided through the proposed internal audit of Economic Development. • CAFT to provide consultative support. • CAFT undertake investigations as required.
17.	Schools (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Internal Audit continue to progress the programme of school probity reviews. • Internal Audit will provide presentations to school governing bodies on the results of the individual school review and emerging fraud risks. • The Head of Internal Audit will provide a presentation to school governors on fraud resilience on 30 September. • A leaflet providing guidance to school governors on fraud resilience is being developed. • Internal Audit are working with Governors Services and Education Finance to develop further training and guidance for school governors on fraud risk and governance issues. • Audit Services undertake investigations as required.

18.	<p>Promote the use of the new Fraud Hotline / Consider data collection (building on the 2012/14 FRS actions)</p>	<ul style="list-style-type: none"> • CAFT have liaised with management across the council to ensure the telephone number is promoted by all services. • Currently the Hotline offers 5 options, however these may be increased in time. Audit Services continue to monitor the effectiveness of the hotline to identify if more options are required. Current options are: - <ul style="list-style-type: none"> - Council Tax, Benefits, LBR (received by CAFT) - Housing - Blue Badge Fraud - Financial Abuse (received by C&A) - Other (received by Audit Services Manager)
19.	<p>Data matching (building on 2012/14 FRS actions)</p>	<ul style="list-style-type: none"> • Internal Audit currently use a data analysis tool to interrogate large data sets. • Audit Services are currently liaising with Kent Audit Group and the software provider to develop increased use of the tool to identify potential fraudulent activity. • Audit Services will continue to explore different options for utilising the product in reactive and proactive fraud work. • CAFT liaised with KCC and attended a software supplier meeting in preparation for the DCLG Fraud Fund bid submission.
20.	<p>NFI (building on 2012/14 FRS)</p>	<ul style="list-style-type: none"> • SPD / Electoral Registration NFI matches were received 26 February 2014 and the review process will be completed by late summer. Referrals emanating from this NFI exercise have been prioritised by the CAFT team. • Audit Services are currently liaising with management in relation to data quality, fair processing notices and data submission/output in preparation for the forthcoming 2014/15 NFI exercise. • Audit Services will investigate allegations of fraud arising from the NFI.

21.	Data Quality – Fraud Reporting (new)	<ul style="list-style-type: none"> • Internal Audit will undertake a compliance audit of the 2014 return, reviewing management data which supports the council's annual submission for the Audit Commissions Fraud & Corruption Survey. • Audit Services will consider the need for further review of risk logs, service plans, service delivery, policies and procedures to ensure the three main strands of an anti-fraud culture are embedded: <ul style="list-style-type: none"> - Acknowledge - Detect & Prevent - Pursue
22.	Internal Investigations – Protocols (building on 2012/14 FRS actions)	<ul style="list-style-type: none"> • Audit Services are currently working with Human Resources and Legal Services in reviewing the HR protocol to ensure data sharing issues, roles and responsibilities are clear. This may include the introduction of an “investigation plan”, signed off by all parties at the commencement of each investigation – setting out the roles, key stage dates etc.
23.	Fraud Web pages & reporting fraud on line (new)	<ul style="list-style-type: none"> • CAFT have yet to review the current web pages and work with communications to develop an effective fraud reporting tool and informative fraud web pages.
24.	Change Management (new) <ul style="list-style-type: none"> • Fraud risk may not be considered or managed appropriately during the implementation of a change • Missed opportunity as fraud resilience may not be built into the new arrangements. 	<ul style="list-style-type: none"> • Assurance is provided through the planned internal audit. • The Head of Internal Audit input into the post implementation review of the Better for Less roll out • Audit Services will offer consultative support to management to help ensure fraud risk is fully assessed and resilience embedded as part of service delivery change.

- **Key: -**

- CAFT (Corporate Anti-Fraud Team)
- C/T (Council Tax)
- CTR (Council Tax Reduction)
- DBS (Disability & Barring Service)
- FRS (Fraud Resilience Strategy)

- HB (Housing Benefit)
 - LBR (Local Business Rates)
 - MBRS (Medway Benefits & Revenues Service)
 - NFA (National Fraud Authority)
 - NFI (National Fraud Initiative)
 - PPP (Protecting the Public Purse – 2013)
 - RTB (Right to Buy)
 - S-FIS (Single Fraud Investigation Service)
 - SPD (Single Person Discount)
- **The number attached to each Key Risk Area has no relevance; it does not denote the order in which each item will be progressed or infer any significance in terms of risk or value.**