



Audit and Standards Committee Report

Report of: Senior Finance Manager, Internal Audit

Date: 28th July 2022

Subject: Internal Audit Annual Fraud Report 2021/22

Author of Report: Stephen Bower, Internal Audit and Risk Manager

Summary: The purpose of this report is to inform the Audit and Standards Committee of the outcomes of the work undertaken by Internal Audit on fraud and corruption during 2021/22 and the proposed work for 2022/23.

Recommendations:

1. That the Audit and Standards Committee Members note the content of this report.
 2. That the Audit and Standards Committee Members note that the Council's policies in relation to fraud and corruption have been reviewed and fulfil the required governance arrangements for the Council.
 3. That the Audit and Standards Committee Members note the completed checklist for those responsible for governance (Appendix A).
-

Background Papers:

Category of Report: Open

* Delete as appropriate

If Closed, the report/appendix is not for publication because it contains exempt information under Paragraph (insert relevant paragraph number) of Schedule 12A of the Local Government Act 1972 (as amended).'

Statutory and Council Policy Checklist

Financial implications
YES /NO Cleared by: L Hunter
Legal implications
Yes /NO
Equality of Opportunity implications
YES /NO
Tackling Health Inequalities implications
YES /NO
Human rights implications
YES /NO
Environmental and Sustainability implications
YES /NO
Economic impact
YES /NO
Community safety implications
YES /NO
Human resources implications
YES /NO
Property implications
YES /NO
Area(s) affected
Corporate
Relevant Scrutiny Board if decision called in
Is the item a matter which is reserved for approval by the City Council?
YES /NO
Press release
YES /NO

Sheffield City Council

Report to the Council's Audit and Standards Committee

Fraud and Investigations

28th July 2022

Purpose of the Report

1. This is an annual report produced by Internal Audit to show the work that has been undertaken across the Council in relation to Fraud and Investigations. This report is to “those charged with governance” which in the case of Sheffield City Council is the Audit and Standards Committee, to show the work that has been undertaken within Internal Audit and how these fit into the national picture.
2. This report shows the outcomes from the work undertaken in 2021/22 and highlights the work to be undertaken in 2022/23. All of the Council's policies relating to fraud and corruption are available to all staff on the Intranet and have been embedded in the operation of the Council.
3. The Council has a full suite of policies attached, which have been fully revised and ensure that the Council has in place adequate governance arrangements for the prevention, detection and prosecution of fraud against the Council. This potential fraud may be covered by employees and the wider general public. These policies were last submitted to the committee in full in 2018 and have been updated for changes in legislation etc. The policies are attached to this report and members are asked to note them.
4. The Chartered Institute of Public Finance (CIPFA) produce an annual fraud and corruption tracker report, which correlates data from Councils and draws together an overall picture of fraud in Local Government across the country. Information from the CIPFA report is referenced in this report.
5. At the end of this report, we have provided a checklist (Appendix A) similar to previous years to provide the Audit and Standards Committee with assurance on the robustness of the Council's Counter Fraud arrangements. This has been revised to take account of the work that has been undertaken during the year.
6. As part of the covid pandemic several Internal Audit initiatives were undertaken to reduce the Councils risk of fraud. These were reported to the Committee previously. Although this work has ended Internal Audit continues to be vigilant to the risks of fraud facing the Council and will take the appropriate actions to mitigate this. We are mindful of the fact that criminal activity continues to target Councils in areas such as bank mandate fraud and we regularly reviews these areas. We are also aware that

with the current squeeze on living standards, some individuals may try to commit fraud against the Council. We continue to review these areas to ensure that fraud does not occur and Council resources can be focused into the appropriate areas of need.

Background

7. According to the National Fraud Authority (NFA), public sector fraud costs the British taxpayer around £24 billion per year, equating to roughly three pence of every pound spent by the government. Research by Policy Exchange finds that fraud and error during the COVID-19 crisis will cost the UK Government in the region of £4.6 billion. The government has awarded the Council a significant number of grants across the year to support the citizens and economy of Sheffield. The imperative was to distribute the grants at speed, with the necessity of speed taking precedence in their introduction, meaning the usual checks and balances were streamlined.
8. The Council has not identified any areas of fraud occurring. There were some issues of omissions and errors which were discovered and were reported to this committee last year. The Council has not identified any further issues and continues to cover the remaining monies outstanding in line with the processes set out by the government. We continue to report regularly to government on these issues. They are satisfied with the actions taken, and the Council is not at risk from losing any income due to government clawback.
9. The Cabinet Office is responsible for the National Fraud Initiative (NFI). This is a biennial process, where data is supplied from a number of Council systems and is matched to data supplied from other Councils and third parties such as Department for Work & Pensions (DWP), Her Majesty's Revenue & Customs (HMRC) and the Student Loans Company. Any data matches are then supplied back to the Council to be investigated. Internal Audit coordinates and facilitates the process on behalf of the Council. The Council last submitted the data to be matched in October 2020. Also, as a result of the large number of Covid grants paid out the Cabinet Office required additional data sets relating to these grants to be submitted at the beginning of 2021. The data was supplied by various services and contractors directly to a secure portal operated on behalf of the Cabinet Office. All data submissions were monitored by Internal Audit. This work is now complete.
10. The first data matches were received in February 2021, with additional matches still being received (as other organisations submitted their data to the exercise at the end of 2021). This work is now complete and reported in detail later in this report.
11. The Council has already responded to the Cabinet Office consultation for the 2022 exercise. The Council will shortly receive details of the information that it must provide, and this will need to be submitted in the autumn. Work is already underway to ensure that all of the services who are required to submit data are aware of the requirements, deadlines and have the appropriate privacy notices in place.

12. As reported previously the Council no longer investigates Housing Benefit fraud. These are undertaken by the Single Fraud Investigation Service (SFIS) which is part of the Department for Work and Pensions (DWP). This is mentioned, as some of the work referenced particularly in regard to NFI includes figures relating to Housing Benefit fraud. Although these are identified within the Council, they are passed to the DWP for investigation and ultimate sanction, although recovery of any overpayment remains the responsibility of the Council.

National Picture

13. It is recognised that each pound lost to fraud represents a loss to the public purse and reduces the ability of the public sector to provide services to the people who need them. According to recent data from CIPFA the cost of fraud to the public sector is estimated to be at least £46.5bn annually and of this £8.2bn is related to Local Government. This increase in 2021 due to the discovery of a number of issues relating to covid business grants awarded by Central Government which were found to be fraudulent.
14. The level of fraud reported in Local Government in 2021 was approximately £284 million. This is up from £253m in the previous year whilst the average value per case has remained about the same at £3,600.
15. The CIPFA report highlights 72,000 frauds have been detected and prevented across local authorities in 2019/20, this is a slight increase from 2018/19. It is likely that the figures for 2020/21 will be skewed by factors related to covid. Internal Audit resources across the country were diverted to supporting services to prevent fraud in the new grant funding regimes and in many instances investigations were delayed.
16. Fraud by its very nature is often difficult to detect. The better the controls that the Council has, the more that those wishing to undertake acts of fraud will look to target weaker and more vulnerable areas, which is why there is an often a shift in the fraudsters focus. Sheffield is not complacent and as part of the Internal Audit annual plan we look to ensure that where fraud is highlighted as a risk that adequate controls are in place.
17. Sheffield City Council has robust processes to try to prevent and detect fraud. These are available to all staff and have become embedded into Council processes. This should reduce the amount of fraud and aid in its early detection. The work of Internal Audit should also reduce the prevalence of frauds, by ensuring services and processes have robust controls in place.
18. To aid this process the Finance and Commercial service has introduced two new groups to support services in the delivery for new and strengthened financial processes. The Financial Design Authority (FDA) group reviews new systems and process which are to take place across the Council to ensure a robust approach to implementation and to ensure that the systems all align with one another and give

value for money. The standards and policies group similarly reviews the Councils policies and financial standard to ensure that they are up to date and operate effectively. The Internal Audit service has representation on both groups and gives advice on the control framework and potential risk of fraud.

19. The Housing Benefit and Council Tax service was successfully transferred from Capita to the Council in January 2020. Capita had previously undertaken data matching exercises for Council Tax Single Person Discount. The service has recently undertaken an exercise in this area. This significantly reduces the risk of this type of fraud occurring and had identified and subsequently corrected numerous incorrect discounts.

Reactive Work Undertaken in 2021/22

20. The level of investigations in 2021/22 increased slightly on the previous year, this was to be expected as the council's activity was refocussed during the initial covid pandemic the previous year.

21. Internal Audit conducted 10 re-active investigations and assisted managers with a further 16 re-active investigations which arose in in 2021/22. Internal Audit also concluded investigation work on 1 re-active investigations and assisted managers with a further 12 investigations which had originated in 2020/21 (delayed due to covid).

22. As the Council has such a large workforce covering a large number of services there will always be a range of issues. These cases were from all portfolios and included theft of cash or assets, falsification of timesheets, financial abuse of service user, excessive use of internet during work time and behaviour breaching standards within the Code of Conduct. The types of frauds identified within the Council mirror those found nationally. South Yorkshire Police were notified and involved where appropriate. Following investigation, appropriate sanctions were applied where the issues were found to be proven. This resulted in several dismissals / resignations. In some cases, it was also found that there was no or insufficient evidence of fraud for action to be taken.

23. One area which continues to be of concern is the number of parking machines which are broken into. In the past year at least 6 have been reported. Parking services monitors the machines and cash is kept to a minimum. The effort that criminals go to in 'attacking' these machines, far outweighs the minimal amounts of money that is lost, however the cost of repair and replacing these machines is significant. All of these items have been reported to the Police.

24. The Council also continues to be attacked by criminal gangs using various types of phishing exercise. These are often aimed at committing bank mandate fraud. Work is ongoing in this area to ensure that the controls in place remain robust.

25. During the course of investigations, any control and process issues / weaknesses identified were reported to management for action.
26. Internal Audit continues to work closely with Human Resources. Human Resources often identify issues such as timesheet fraud as part of wider staffing issues and they have arranged a standard notification process for Internal Audit. There are also regular liaison meetings with Internal Audit, Human Resources and the Monitoring Officer where investigations and governance issues are discussed. This ensures consistency of approach on these matters. Internal Audit has only a limited amount of qualified investigator resources and these are therefore targeted at the most appropriate cases.
27. Internal Audit also liaised with a number of outside organisations including various banks, HMRC, DWP and the Insolvency Service in relation to fraud allegations relating to Covid grant frauds or scams.

Fraud work across the Council in 2021/22

28. Other services across the Council (note – they are not part of the Internal Audit service structure) also identify and address fraud and theft. Some of the work undertaken and the outcomes are summarised below.

Blue Badges

29. Parking Services continues to remove Blue Badges where they are being abused. A recent change to the Blue Badge penalty system means that cautions can now be offered to the offender, as an alternative to prosecution. The option to offer a caution has enabled a more cost-effective penalty which stays on record and can be used as evidence should the offender misuse a Blue Badge in the future and a prosecution pursued.
30. In 2021/22 no prosecutions took place. It should be noted that traffic restrictions were lifted for part of the year and also that traffic volumes were reduced. The service continues to enforce restrictions in a suitable manner, and they will be looking to impose the appropriate sanctions where these are required going forward. The service has stated that they are now fully operational.
31. Nationally the estimated average value per Blue Badge fraud cases is £687m. It should however be noted that the cost is per case and is likely to be lower in Sheffield, as we do not currently have a congestion charge or the scale of parking fees seen in London, where Blue Badge fraud would cost the authority considerably more.

Housing Tenancy and Right to Buy Fraud

32. It is difficult to fully determine the number of fraudulent tenancy cases as often the tenants hand back their tenancy when they are aware of an investigation taking

place. This means that lengthy and costly legal action is avoided and the houses are once more available to be used by the citizens of Sheffield who need them. The Council will always take the appropriate legal action if fraud can be proven, even if the tenancy has been given up.

33. These cases were investigated by the Housing Fraud Team (this is a small team which is part of the housing service and has 2 qualified investigators), including Right to Buy cases.
34. The service had 132 active cases at the start of the year (many delayed due to covid) and they started an additional 98 cases and were able to close 139 cases throughout the year.
35. 23 properties were returned as tenants quit whilst under investigation. 1 further property was abandoned during and investigation. A right to buy was also stopped.
36. Although many court cases were stopped during covid. One court case was heard and following a guilty plea the defendant received 150 hours of community service as well as having to repay almost £5,000 plus costs. The individual was also excluded from the Council rehousing register.
37. Now that the legal restrictions have been lifted, legal action will now continue in a further 6 criminal and five civil prosecutions.
38. In 2022/23 additional work is planned for the Housing Fraud Team, including:
 - Training Trading Standards officers on the use of the National Anti-Fraud Network (NAFN).
 - Briefings with local area policing teams on housing fraud.
 - Housing Fraud briefings/refresher for SCC colleagues.

Bank Mandate Fraud

39. Bank mandate fraud continues to be a significant issue. Although we have robust controls in place to detect and prevent this, the Council is still targeted by organised criminal gangs who undertake phishing exercises. Methods are becoming more sophisticated, but our knowledge of this threat continues to develop. Alerts from neighbouring Local Authorities as well as the National Anti-Fraud Network (NAFN) and the police are regularly circulated to the relevant service areas.

Whistleblowing

40. The number of whistleblowing issues reported remains low. The updated policy introduced in 2018 has been publicised. As whistleblowing is often seen as a last resort, it may be that the other Council processes are sufficient to allow for issues to

be raised without the need to use the whistleblowing policy. Work will be undertaken during 2022/23 to promote this policy.

Pro-Active Fraud Work 2021/22

41. Three pieces of pro-active counter fraud work have been undertaken by Internal Audit during the year. These involved a piece of work to examine the outcomes of the NFI to identify patterns and issues, where there was the potential to prevent these by strengthen controls. Two specific NFI reports relating to data matches between the Councils payroll (and others) and also the registering of business interests and Directorships were also fully examined. These did not identify any instances of fraud being undertaken.
42. Recommendations have been made in these areas where required, to improve control processes. Follow-ups of previous year's reviews were undertaken, and adequate progress had been made and reported to the Audit and Standards Committee via the Recommendation Tracker report.
43. In addition, there was work on data matches relating to the NFI exercise which are reported later.

The Counter-Fraud Plan for 2022/23

44. The councils internal audit department will continue to have an active role in the prevention detection and prosecution of fraud across the council. It will continue to support services through business partnering activity to ensure that we have a robust governance framework place.
45. The internal audit plan for 2022/23 includes four pieces of proactive work:
 - Review the processes for Council Tax Exemptions
 - Review the process for granting Small Business rates relief
 - Reviewing The Councils Anti-Fraud policies
 - Reviewing Councillors Declarations of Interest

Fraud E-learning

46. The Fraud E-Learning package has been produced by Internal Audit and is now available to all staff and Councillors on the Councils learning development hub.
47. This has been promoted to all staff and has been made part of the managers mandatory learning. As of the first of July, 1146 staff had undertaken the training.

48. The Fraud E-Learning package has been developed to give support to officers and members in understanding fraud risks and putting in place measures to prevent/reduce the prevalence of fraud. The package has been tailored to the needs and processes of the Council.

49. The package covers the following areas:

- Introduction to fraud
- Fraud Definition
- Fraud types
- How to prevent Fraud
- Reporting Fraud
- How to respond to fraud
- National Fraud Initiative (NFI)
- Bribery
- Money Laundering
- Frequently Asked Questions
- Further Information

50. This package will support the policies noted by this Committee today.

Internal Audit Resources

51. Internal Audit now has three accredited counter fraud specialists, who undertake work in the fraud area, in addition to their other audit duties. This allows for flexibility in resourcing the natural peaks and troughs for the workload.

52. In 2022/23 the resources made available for fraud work is 204 days or 14% of the total days available. This is slightly less than last year; however, this is to be expected due to the variations of work caused by the NFI cycle.

53. The plan covers the following areas:

- Time for investigations (this is an allocation of time from which individual investigations are allocated).
- Time to undertake work on the National Fraud Initiative.
- Proactive fraud reviews
- Time to undertake an annual review of the Housing Benefits processes.

National Fraud Initiative (NFI)

54. The Council (SCC) has a statutory duty to supply a number of data sets covering such areas as payroll, pensions, creditors, housing tenants, blue badge holders, resident parking permits and right to buy. These were supplied to the Cabinet Office in October 2020.
55. Internal Audit ensured that SCC complied with the data privacy requirements and liaised with various SCC services and schools to ensure accurate data was submitted in advance of the deadline. For the first time the Cabinet Office advised that they charge financial penalties to any Local Authority who either submitted poor quality data or submitted data after the given deadline. SCC met the data quality threshold and submitted the data in advance of the deadline, so were not penalised.
56. The national exercise is undertaken to collate this information electronically and where appropriate to provide data matches. These matches were provided in February 2021 (with additional matches provided throughout the year). These matches may identify fraud or input error, but in most cases the matches are a result of timing differences in the data matching process.
57. The National Fraud Initiative (NFI) for 2020/21 initially returned nearly 10,000 data matches for the Council.
58. Internal Audit have provided support and training to service areas where needed, as the secure portal was updated following a previous consultation.
59. As a result of a review of the matches, 4,800 matches were processed, including all of the core 890 high risk matches. At the present time fewer than 10 matches are still to be finalised. These matches fall within Housing and the Council Tax Support service areas. Due to the complex nature of the matches, the investigations can often be lengthy and it is expected that some investigations are still ongoing.
60. In addition to the standard NFI, the Cabinet Office mandated the submission of Covid grant data, which SCC supplied in December 2020. The matches were due to be released in March but due to delays encountered the NFI team did not release the matches until mid-May. A total of 146 matches were received following in excess of 9,000 grants being issued.
61. The only reports to yield financial outcomes in this exercise were the Housing Benefit, Council Tax Support, duplicate creditor invoices and pension gratuities reports.
62. Nearly 700 customer records were updated following the review of deceased record matches.
63. In total, fraud and errors the NFI 2020/21 exercise identified 135 errors and frauds with a value of over £164,000. Over £86,000 has been / is in the process of being

recovered. A summary of the areas in which these errors and frauds were identified follows:

Council Tax Support matches

64. Council Tax Support reports identified 27 fraud / error cases, with overpayments with a value of over £42,000 being identified. The majority of these cases were matched with pension data, with the remaining cases matched to payroll and taxi licence data. This represents an increased number and value than that identified in the 2018/19 exercise (6 cases totalling £7,200)

Creditor matches

65. For the first time the creditor reports identified two duplicated payments for the total value of £32,206. Both of which were recovered as a result of action by the creditors team, as soon as the reports were reviewed.

Pension Gratuities matches

66. Pension gratuities identified 97 cases, totalling nearly £77,000 where payments had continued to be made after the individual had passed away. This is an increase on those identified in the 2018/19 exercise (37 cases totalling £27,200).

67. The current policy remains that gratuities overpayments are not recovered but instead written off.

Record updates

68. The customer service team were able to update the records of 693 blue badge holders who had passed away. Deceased information also enabled the records of 2 housing tenants and a parking permit holder to be updated accordingly.

Checklist for 'Those Responsible for Governance'.

69. A checklist similar to previous years is included at Appendix A.

70. The tolerance of fraud within an organisation is a key element of a counter fraud framework. SCC has formally adopted a Policy Statement on Fraud and Corruption that underlines a zero tolerance to such acts. Fraud awareness training has been provided to services throughout the Council.

Recommendations

71. That the Audit and Standards Committee Members note the content of this report.

72. That the Audit and Standards Committee Members note that the Council's policies in relation to fraud and corruption have been reviewed and fulfil the required governance arrangements for the Council.

73. That the Audit and Standards Committee Members note the completed checklist for those responsible for governance (Appendix A).

Page intentionally left blank.



Governance Checklist for Fraud 2021/22

**Sheffield City Council
July 2022**

**Prepared by Internal Audit on
behalf of the Audit and
Standards Committee**

Introduction

The checklist allows Councils to evaluate their arrangements. This document seeks to evaluate the arrangements in place within Sheffield City Council.

This document has been prepared by Internal Audit to highlight to the Councils Audit and Standards Committee which is referred to as “those charged with governance” that the Council has in place adequate arrangements for the prevention, detection and investigation of fraud that may occur within the Council.

General	Yes	No
1. Do we have a zero tolerance policy towards fraud?	✓	
<p><u>Actions</u></p> <p>The Council’s Anti-fraud and Corruption Policy Statement and Framework, contains a statement that clearly states that the Council has a zero tolerance to fraud, and that it expects its employees to uphold the highest ethical standards and to strictly adhere to its anti-fraud framework and associated policies.</p> <p>As part of the Officers Code of Conduct, the Policy Statement - Fraud & Corruption incorporates a message from the Chief Executive which clearly states the ‘zero tolerance’ approach of the authority. It incorporates the fact that any instances of fraud or corruption will be treated as gross misconduct.</p> <p>Internal Audit has produced an eLearning training section of Human Resources service which supports the implementation of the counter-fraud policies across the Council. This is mandatory training for all managers and so far, 1046 members of staff have completed the training.</p>		
	Yes	No
2. Do we have the right approach, and effective counter-fraud strategies, policies and plans? Have we aligned our strategy with Fighting Fraud Locally?	✓	
<p><u>Actions</u></p> <p>The following fraud related strategies, policies and plans are in place: Financial Regulations 2022 Code of Conduct for officers Policy Statement – Fraud & Corruption (appendix to the above) Internal Audit Plan (incorporating pro-active and re-active counter fraud assignments) Finance Service Plan (including specific counter-fraud related deliverables) Annual Governance Statement (fraud risks) Fraud awareness e-learning module</p> <p>The Council has a full suite of policies for Anti-Fraud and Corruption; these were updated and endorsed by the Audit and Standards committee in 2022. The policies</p>		

are designed to fit together in a consistent manner to ensure that they comply with the latest relevant legislation and guidance.

Anti-fraud and Corruption Policy Statement and Strategy – Overarching document which draws together all of the Council's other policies in relation to the fraud and corruption. It follows the CIPFA code in that it acknowledges the responsibilities of Officers and Members for countering fraud and corruption. It demonstrates how the Council will try to prevent fraud by identifying the fraud and corruption risk and then identifying strategies to mitigate these. It also sets out how the Council will pursue and take action against those who try to perpetrate fraud and corruption.

Fraud Risk - This document is designed to help managers in identifying fraud risks in their areas and to put forward strategies to manage and mitigate these risks.

Fraud Response Plan – This document has been written to aid managers in dealing with potential fraud issues and to investigate these in line with the relevant Council Human Resources policies.

Anti-Money Laundering Policy - This document was fully revised to comply with the current legislation in this area. It sets out what individuals need to do if they become aware of any potential money laundering activity.

Bribery and Corruption Policy – This document was devised to fill a gap in the Council's framework. By having this policy and adhering to it, it ensures that the Council has a defence should it or any of its employees be accused of bribery and corruption.

Know your Customer – This document is to aid checking of customers across the Council to comply with bribery and money laundering requirements.

Guidance to Schools – This is available to schools so that they can more easily identify and mitigate the risks that they face in relation to fraud and corruption.

Investigations Guidance – This provides information to support managers who are required to formally investigate allegations made against employees.

	Yes	No
3. Do we have dedicated counter-fraud staff?	✓	
<p><u>Actions</u></p> <p>Service Managers are responsible for the investigation of fraud within their respective areas. Internal Audit has accredited officers available to investigate larger scale allegations and provide advice to managers.</p> <p>Internal Audit has a limited resource for fraud investigation as outlined in the Annual Plan. At present there are three qualified fraud investigators in the service.</p> <p>There are dedicated officers in Trading Standards and in Housing to investigate housing tenancy fraud.</p> <p>Resource is also provided from service areas across the Council to undertake work on the NFI matches and with any resulting investigations.</p>		
	Yes	No
4. Do counter-fraud staff review all the work of our organisation?	✓	
<p><u>Actions</u></p> <p>Internal Audit maintains a resource to address fraud issues e.g. policy issues, serious allegations etc. and the Internal Audit plan contains a small number of counter fraud exercises to review specific fraud risks.</p> <p>Service management has the primary responsibility for internal fraud investigation (with the support of Human Resources).</p> <p>Internal Audit operates a risk based approach to auditing and key risks are identified for inclusion in the audit plan in conjunction with service management. Internal Audit considers fraud risk for inclusion in the scope of each audit review.</p> <p>The Council has suitably qualified risk advisors within Internal Audit who can support services in identifying and mitigating all types of risk across the Council.</p>		

	Yes	No
5. Does a councillor have portfolio responsibility for fighting fraud across the council?	✓	
<p><u>Actions</u></p> <p>The Strategy and Resources Committee of the Council is responsible for cross cutting responsibility for the development and of the Council's budget and financial policy framework. There is no specific responsibility delegated to the post to cover fighting fraud across the Council.</p> <p>The Audit and Standards Committee receive reports on Fraud arrangements across the Council and are responsible for reviewing the effectiveness of the arrangements in place.</p>		
	Yes	No
6. Do we receive regular reports on how well we are tackling fraud risks, carrying out plans and delivering outcomes?	✓	
<p><u>Actions</u></p> <p>The Annual Governance Statement provides a level of assurance that fraud risks have been identified and addressed.</p> <p>The Internal Audit Plan is endorsed by the Audit and Standards Committee on an annual basis and the Senior Finance Manager (Internal Audit) produces an annual report which includes information on counter fraud activities.</p>		
	Yes	No
7. Have we assessed our management of counter-fraud work against good practice?	✓	
<p><u>Actions</u></p> <p>A code of practice was produced by CIPFA in 2016 and this checklist reviews the Council's policies against the requirements of the Code.</p> <p>Internal Audit are members of the National Anti-Fraud Network (NAFN) and South and West Yorkshire Investigators Group (SWYFG) forums where best practice is shared, and this is incorporated into our methods of working.</p> <p>The Council has a suite of fraud and corruption policies to ensure that we have a consistent and comprehensive anti-fraud framework for the Council.</p>		
	Yes	No

8. Do we raise awareness of fraud risks with:		
■ new staff (including agency staff);	✓	
■ existing staff;	✓	
■ elected members; and	✓	
■ our contractors	✓	
<p><u>Actions</u></p> <p>Fraud is specifically covered in the Officer’s Code of Conduct. It is a requirement that all agency staff must comply with the code, and it is the appointing manager’s responsibility to ensure that the individuals concerned are fully compliant with the code at the start of their appointment. Specific short-term appointments such as those of polling clerks may not cover the full code but specific fraud issues pertinent to these posts are specifically raised with the individuals concerned.</p> <p>Additional training has been provided to key staff on request. An online training programme for fraud is available on the learning development hub.</p> <p>Commercial fraud risks are addressed by a requirement for contractors to comply with all current legislation (and indemnity provision) being incorporated into the standard terms and conditions. In addition, specific anti-competitive and anti-bribery conditions apply to the contracting process.</p>		
	Yes	No
9. Do we work well with national, regional and local networks and partnerships to ensure we know about current fraud risks and issues?	✓	
<p><u>Actions</u></p> <p>Sheffield City Council maintains membership with Core Cities and the South & West Yorkshire Fraud Investigators Group.</p> <p>There are effective working arrangements in place between the Council and Department for Work and Pensions (DWP) to cover the requirements of the Single Fraud Investigation Service (SFIS).</p> <p>The National Anti-Fraud Network (NAFN) and the Financial Crime Information Network provide bulletins on current fraud risks. Internal Audit staff are members of professional bodies such as CIPFA, Institute of Internal Auditors and CIMA. These bodies provide periodic updates in areas such as fraud risks. These updates are cascaded throughout the team as appropriate.</p> <p>CIPFA is the lead accountancy body for fraud governance arrangements in Local Government. Internal Audit ensures that the Council complies with CIPFA guidance.</p>		

The Internal Audit Service of the Council is required to comply with the Public Service Internal Audit Standards. As part of the requirements of the standards, a peer review was undertaken in 2021 and the service was found to generally conform.

	Yes	No
10. Do we work well with other organisations to ensure we effectively share knowledge and data about fraud and fraudsters?	✓	

Actions
 As 9 and 10 above plus:

The Cabinet Office' National Fraud Initiative (NFI) operates under formal arrangements and provides for the sharing of data between local authorities and other participating organisations. As part of the South and West Yorkshire Investigators Group information on fraud issues is shared on a regular basis. A shared portal has been developed by Cheshire Council to allow this to be undertaken in an easier way.

We also use the online reporting system to Action Fraud.

	Yes	No
11. Do we identify areas where our internal controls may not be performing as well as intended? How quickly do we then take action?	✓	

Actions

As noted in the main body of the report finance and commercial services has developed two groups, the financial design authority and the policy and standards group which coordinate the development of new financial systems and review and update financial policies and processes.

The majority of the annual Internal Audit Plan contains risk-based audits. A risk assessment is undertaken and discussion held Service Directors to establish key risks. Each of the audits includes an assessment of the internal controls within scope to identify instances in which they are not present or not working effectively. Auditors consider fraud risks for each assignment.

Where appropriate recommendations are made to improve internal controls at the conclusion of each review, implementation is confirmed with the client and followed up.

A small number of pro-active counter fraud reviews are included in the Internal Audit Plan that focuses on activities where, due to the nature of the service, the risk of fraudulent activity is heightened. At the conclusion of appropriate re-active investigations, systems and controls are reviewed to identify weaknesses and to recommend improvements to prevent future instances of fraud both within the relevant service area and corporately.

A number of audits were undertaken following investigations to provide assurance to service areas where flawed internal controls had been identified during the investigation process.

	Yes	No
12. Do we maximise the benefit of our participation in the Cabinet Office National Fraud Initiative and receive reports on our outcomes?	✓	

Actions

The Council has been a participant in the NFI since 1995. Data matches are circulated to all relevant service areas for review and investigation where needed. Internal Audit maintains a coordinating and advisory role in addition to responsibility for examination of some data matches and validates the outcomes prior to the conclusion of each exercise.

Internal Audit examines areas from the NFI where significant numbers of new matches have been identified to ensure that the procedures in place are adequate to minimise the risk of fraud.

	Yes	No
13. Do we have arrangements in place that encourage our staff to raise their concerns about money laundering?	✓	

Actions

The Council has adopted a detailed Anti Money Laundering Policy. This document has been revised and includes an appendix which contains guidance to staff and is available via the Intranet. Incidents are reported to Internal Audit and in turn the National Crime Agency where appropriate.

	Yes	No
14. Do we have effective arrangements for:		
■ reporting fraud; and	✓	
■ recording fraud	✓	

Actions

Financial Regulations require Executive Directors to ensure that Internal Audit (on behalf of the Section 151 officer) is notified of all incidents of financial irregularity. Internal Audit records each reported incident.

Perceived Money Laundering attempts against the Council have also been reported promptly to Action Fraud.

Although the above controls are in place, full compliance cannot be assured. Work is ongoing to raise awareness of fraud reporting. This work is continual as staff are

always moving and new issues are always arising.

A key issue to be reviewed going forward is to identify and record not only proven fraud activity, but also areas which are serious issues where actual fraud is indicated, but not proven.

	Yes	No
15. Do we have effective whistle-blowing arrangements? In particular are staff:		
■ aware of our whistle-blowing arrangements	✓	
■ have confidence in the confidentiality of those arrangements	✓	
■ confident that any concerns raised will be addressed	✓	

Actions

The Council has adopted an extensive Whistleblowing Policy that contains an explanation on whistleblowing arrangements and the reporting access routes including the details of designated contact officers. The Human Resources service maintains a central register of allegations. Whistleblowing allegations are all reviewed and where appropriate fully investigated by someone independent of the area.

Regular meetings take place with between Internal Audit, the Head of Human Resources, and the Monitoring Officer to review whistleblowing and investigation cases.

	Yes	No
16. Do we have effective fidelity insurance arrangements?	✓	

Actions

The Council has adequate fidelity insurance cover.

There is an annual requirement to complete a pro-forma for the fidelity guarantee insurance. This is undertaken by the Insurance Section with input from Internal Audit, Treasury Management and Financial Systems Support Group (FSSG). This has recently been completed for the forthcoming year and accepted by the insurance company.

Fighting Fraud with reduced Resources	Yes	No
---------------------------------------	-----	----

17. Are we confident that we have sufficient counter-fraud capacity and capability to detect and prevent fraud?	✓	
<u>Actions</u>		
The Internal Audit plan is produced on an annual basis. The formulation of this plan incorporates new and emerging risks including those associated with the current financial climate. The resources are regularly reviewed as there is very little capacity in the system should a major incident (or several smaller incidents) occur.		
Current risks and issues	Yes	No
Housing tenancy		
18. Do we take proper action to ensure that we only allocate social housing to those who are eligible?	✓	
<u>Actions</u>		
The lettings policy ensures that there is a vetting and validation process in place to confirm identity and eligibility of everyone prior to the letting of any property. The Housing service has a fraud team in place to investigate any instances of potential tenancy fraud, such as sub-letting and to follow these up and recover properties and prosecute where appropriate.		
	Yes	No
19. Do we take proper action to ensure that social housing is occupied by those to whom it is allocated?	✓	
<u>Actions</u>		
Home visits and day to day contact with tenants provides assurance on occupancy however resources have been allocated to recover properties identified. The National Fraud Initiative (NFI) exercise also identifies potential issues with tenancies, which are further investigated by the Housing Fraud team.		
Procurement	Yes	No
20. Are we satisfied our procurement controls are working as intended?	✓	
<u>Actions</u>		
Internal Audit work in this area has previously not identified any significant weaknesses.		
	Yes	No

21. Have we reviewed our contract letting procedures to ensure they are in line with best practice?	✓	
<p><u>Actions</u></p> <p>Aspects of contract letting feature in the Internal Audit annual plan. All audits covering the letting or management of contracts now include testing in this area.</p>		
Recruitment	Yes	No
22. Are we satisfied our recruitment procedures:		
■ prevent us employing people working under false identities;	✓	
■ confirm employment references effectively;	✓	
■ ensure applicants are eligible to work in the UK; and	✓	
■ require agencies supplying us with staff to undertake the checks that we require?	✓	
<p><u>Actions</u></p> <p>The Council has in place controls to ensure that all of the above areas are covered; this included a requirement for the Council's agency staff provider to complete the appropriate propriety checking.</p> <p>Internal Audit has completed testing in this area as part of its normal auditing work, and no issues have been found in the performance of the controls linked to the above areas.</p>		
Council tax discount	Yes	No
23. Do we take proper action to ensure that we only award discounts and allowances to those who are eligible?	✓	
<p><u>Actions</u></p> <p>The Council Tax and Business Rates systems (including discounts) are regularly reviewed by Internal Audit as part of the assurance provided on the Council's main financial systems.</p> <p>Council Tax team undertake an annual exercise to review the application of single person discounts. This includes checking with third parties and has consistently controlled the validity of this discount.</p> <p>The National Fraud Initiative matches payroll and pension records against Council Tax Support records every two years and reports any potentially fraudulent claims for this discount.</p>		
Other fraud risks	Yes	No

24. Do we have appropriate and proportionate defences against emerging fraud risks:		
■ Business rates	✓	
■ Right to Buy	✓	
■ Council Tax Scheme;	✓	
■ Schools	✓	
■ Grants	✓	
■ PIP – Personal Independent Payment	✓	
■ Blue Badge fraud	✓	
■ Bank mandate fraud	✓	
<p><u>Actions</u></p> <p>Emerging fraud risks are taken into account in the formulation of the Internal Audit annual plan in addition to other identified risks. Examination of emerging risks is included in the scope of planned audits or scheduled for specific future review.</p> <p>Notifications of emerging fraud risks are regularly received from the National Anti-Fraud Network (NAFN) and the police. These are reviewed and distributed by Internal Audit.</p>		