

**CORPORATE COUNTER FRAUD STRATEGY – ACTION PLAN TO 30TH SEPTEMBER 2013**

<b>Action Point</b>	<b>Action Required</b>	<b>Method of Delivery</b>	<b>Monitoring Arrangements</b>	<b>Responsibility</b>	<b>Target Date</b>	<b>Current Status</b>
<b>1</b>	Maintaining Current Procedural Rules	Annual review of Financial and Contractual Procedural Rules informed by findings of planned internal audits.	Confirmation of completed review to be provided in Annual Governance Statement.	Strategic Director Resources	30th June 2013	Officer working group reviewing Contract Procedure Rules for recommending to Constitution Review Working Group. Review of Financial Procedure Rules to follow in 2013/14 – see paragraph 3.19 of the AGS

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<b>2</b>	Drafting Procedural Instructions	Annual review of Procedural Instructions published and any challenges to their adequacy in internal audit reports.	Confirmation of completed review to be provided in Annual Governance Statement.	Strategic Director Resources	30th June 2013	Two key areas of financial procedures are being updated: creditors and payroll – subject to completion, a further comment will be made in the Financial management section of the AGS
<b>3</b>	Monitoring Recruitment Procedures	Monitoring 10% of completed recruitment exercises to inform an annual check that prescribed procedures comply with legislation and acknowledged good practice.	Confirmation of completed review to be provided in Annual Governance Statement.	Head of Business Support People	30th June 2013	Sampling of recruitment files to be undertaken during April/May – a comment will be added to section 4 of the AGS

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4	Monitoring the Registers	Review of each of the Registers by the Monitoring Officer on a monthly basis	<p>Analysis of the use made of the Registers by Members and Officers together with any identified cases of non-compliance to be included in Annual Governance Statement</p> <p>Regular monitoring to be evidenced by endorsements to the Registers</p>	Monitoring Officer	31st March 2013	First review April 2013

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<b>5</b>	Using the Induction Process to Communicate Standards of Acceptable Behaviour.	Review of existing arrangements by Head of Business Support – People.	Outcome of review to be recorded in the Annual Report of Internal Audit.	Head of Business Support People	30th April 2013	Addressed in review of Induction process due to be implemented early May 2013
<b>6</b>	Delivering Regular Employee Briefings	An annual presentation will be delivered by the Head of Consortium as part of an All Staff Briefing. This will be reinforced by an article in One Council Newsletter	A summary of action taken to promote employee awareness will be appended to the Annual Report of Internal Audit.	Head of Consortium	30th June 2013	In Annual Audit Plan for delivery during Q1
<b>7</b>	Confirming Employees' Acceptance of the Council's Standards	Use of employee surveys	The results of such surveys will be used to evidence the Annual Governance Statement.	Head of Business Support People	31 <sup>st</sup> March 2013	Survey planned following Council approval of refreshed code of conduct for employees expected June 2013
<b>8</b>	Maintaining effective internal controls	Addressed through the production of the Annual Audit Plan using standard risk-based planning tools	Audit & Risk Committee will satisfy itself that the Annual Plan provides for adequate assurance about the Council's key internal controls.	Head of Consortium	31st March 2013	Addressed in Annual Audit Plan reported for approval at this Committee meeting

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<b>9</b>	Publicising Whistleblowing Arrangements	The Strategic Communication Advisor will identify and coordinate the delivery of appropriate publicity of whistleblowing arrangements.	A summary of action taken to promote public awareness will be appended to the Annual Report of Internal Audit.	Strategic Communication Advisor	31st March 2013	Article in One Council and update of website April 2013
<b>10</b>	Maintaining Lines of Communications with Local Police	Head of Consortium to negotiate with Leicestershire Constabulary to gain agreement that the Inspector in charge of the Local Policing Unit for Rutland should be first point of contact.	Outcome of negotiations to be reported in Annual Report of Internal Audit	Head of Audit Consortium	30th June 2013	Awaiting response from Police
<b>11</b>	Production of a Corporate Prosecution Policy	New Policy to be commissioned by the Head of Business Support - Resources	Policy will be taken to Cabinet for approval. The adoption of the Policy will be acknowledged in the subsequent assessment of the Strategy.	Head of Business Support Resources	30 <sup>th</sup> September 2013	In discussion with the Head of Legal Services

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<b>12</b>	Pursuit of Publicity	Responsive activity undertaken and recorded by the Strategic Communication Advisor	The Head of Consortium will include data on the publicity obtained in the annual assessment of the Strategy.	Strategic Communication Advisor	TBC	Responsive publicity is undertaken
<b>13</b>	Providing assurance that fraud and corruption risks are being managed	Head of Consortium will, as part of the process of developing the Annual Audit Plan, provide the Strategic Director for Resources with an evidenced assessment of the Council's exposure to risks of fraud or corruption in different aspects of its activities.	The Strategic Director for Resources will, in the covering report to Audit & Risk Committee, provide a formal endorsement of the provision made in the Annual Audit Plan for specific counter-fraud work.	Head of Consortium	31st March 2013	Addressed in Annual Audit Plan
<b>14</b>	Annual Reporting on the Strategy's Effectiveness	Annual Report of Internal Audit will provide Members with confirmation that agreed Action Points have been delivered. The Report will also contain a formal assessment of the Strategy's impact and effectiveness	Annual Report of Internal Audit is a mandatory report identified in the Audit & Risk Committee's annual work programme.	Head of Consortium	30th June 2013	Annual Report will be reported to June 2013 meeting of Committee