

## The Fighting Fraud and Corruption Locally (FFCL) Companion Self Assessment Checklist - update

The following guide is a suggested voluntary checklist, describing a standard that a local authority can measure itself against to create an effective counter fraud and corruption culture and response:

Ref	FFCL Companion Checklist Recommendations	Council's Self Assessment
1	Statistics are kept and reported by the fraud team which cover all areas of activity and outcomes.	Yes, local performance indicators are set, with targets and outcomes reported on a quarterly basis to the Corporate Committee.
2	Fraud officers have unfettered access to premises and documents for the purposes of counter fraud investigation.	Yes, this is set out in the council's constitution: Finance Procedure Rules Part Four, Section I, paragraph 5.45 (d).
3	There is a programme to publicise fraud and corruption cases internally and externally which is positive and endorsed by the council's communication team.	Yes, regular press releases are made following successful prosecutions and fraud prevention initiatives. Articles in staff newsletters, pension newsletters, Haringey People and Home Zone are also done regularly.
4	All allegations of fraud and corruption are risk assessed.	Yes, this forms part of the individual assessment processes when each case is referred to the Fraud Team and recorded on the case management database
5	The fraud and corruption response plan covers all areas of counter fraud work: <ul style="list-style-type: none"> <li>– prevention</li> <li>– detection</li> <li>– investigation</li> <li>– sanctions</li> <li>– redress</li> </ul>	Yes, the council's counter fraud and corruption policy includes all relevant sections. There is a separate Sanctions Policy which forms an appendix to the overall policy.
6	The fraud response plan is linked to the audit plan and is communicated to senior management and members.	Yes, the annual audit plan is informed by previous cases of reactive fraud and the outcomes of pro-active counter-fraud work. Reported to Statutory Officers Group and the Corporate Committee.
7	Asset recovery and civil recovery is considered in all cases.	Yes, where prosecution cases are proven, the Fraud Team work with the Council's Legal Services and the police to use Proceeds of Crime Act

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		(POCA) legislation to recover funds.
8	There is a zero tolerance approach to fraud and corruption which is always reported to committee.	Yes, the 'zero tolerance' approach is set out in the council's Anti-Fraud Policy.
9	There is a programme of proactive counter fraud work which covers risks identified in assessment.	Yes, the Fraud Team undertakes a programme of pro-active work; the outcomes are reported to the Corporate Committee.
10	The fraud team works jointly with other enforcement agencies and encourages a corporate approach and co-location of enforcement activity.	Yes, the Fraud Team work with the Metropolitan Police, British Transport Police, Home Office, Immigration Service and other agencies on specific counter-fraud projects, managed by the external agencies, or our own internally managed projects.
11	The local authority shares data across its own departments and between other enforcement agencies.	Yes, information on counter-fraud work is shared with council services as part of the process to improve controls; information is shared with external agencies where data protection processes and information sharing agreements are in place to ensure compliance with legislation and confidentiality of data.
12	Prevention measures and projects are undertaken using data analytics where possible.	Yes, this is an area the Fraud Team are developing to improve pro-active project work.
13	The local authority actively takes part in the NFI and promptly takes action arising from it.	Yes, results and outcomes are reported to the Corporate Committee.
14	There are professionally trained and accredited staff for counter fraud work. If auditors undertake counter fraud work they too must be trained in this area.	Yes, staff in the Fraud Team are trained to Professional in Security (PINS) standards.
15	The counter fraud team has adequate knowledge in all areas of the local authority or is trained in these areas.	Yes, staff have significant experience in counter-fraud work; ongoing training and networking opportunities are arranged to ensure knowledge in key fraud risk areas and emerging fraud trends is kept up to date.
16	The counter fraud team has access (through partnership/other local authorities/or funds to buy in) to specialist staff for: <ul style="list-style-type: none"> <li>– surveillance</li> <li>– computer forensics</li> </ul>	Yes, this is considered on a case by case basis. The Fraud Team works with the Metropolitan Police's 'Payback Unit' to use POCA legislation to recover assets.

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	<ul style="list-style-type: none"> <li>– asset recovery</li> <li>– financial investigations</li> </ul>	
17	Weaknesses revealed by instances of proven fraud and corruption are scrutinised carefully and fed back to departments to fraud proof systems.	Yes, reports to service management are provided for all pro-active and reactive counter-fraud investigations which highlight where risks to the control environment have been identified and recommendations are made to minimise future occurrence.