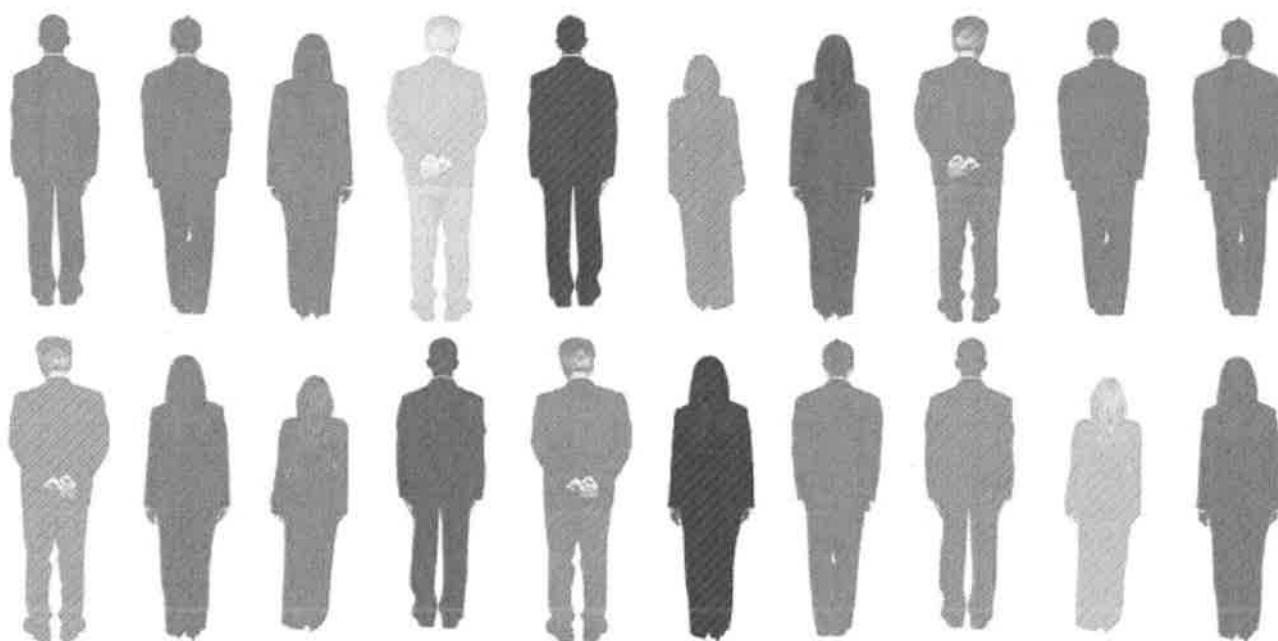


Cheshire West & Chester Council



ANTI-FRAUD AND CORRUPTION STRATEGY



Visit: www.cheshirewestandchester.gov.uk/internalfraud



Cheshire West
and Chester

Contents

01	FAQ's
02	Executive summary
03	Section 1; Introduction to the Anti-Fraud and Corruption Strategy
07	Section 2; Corporate Anti Fraud and Corruption Policy
14	Section 3; Whistleblowing Policy
18	Section 4; Anti Fraud and Corruption Response Plan for Staff and Managers
22	Section 5; Anti Fraud and Data Matching Strategy
24	Anti Fraud and Data Matching – Our Approach
26	Appendix 1 – Examples of Data Matching

If you require any further information about anything contained within these policy documents then please contact:

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Frequently Asked Questions

Q In plain terms, what is this all about?

A This strategy is about CWAC making it clear that it will not tolerate fraud or abuse of power by staff, members, contractors or others engaged in business with the Council.

The Council also wants you to know that it will deal with reported concerns in a consistent and fair manner.

Q Ok, but this is a long document. Do I really have to read it all?

A Unless you are a senior manager, it is probably enough to know that the strategy exists and that you have a copy should you ever need it. If you are a manager however, you will need to know what to do if problems are identified or reported to you. The document has been segmented to make it easier and you should familiarise yourself with its contents.

Q Does it tell me what to do if I become aware of an incident that I feel should be reported?

A Yes, this is explained quite clearly. It also explains how the Council will protect your interests and, as long as you have acted in good faith, make sure that you are not subjected to any detriment by acting in a responsible and concerned manner.

Q Have I had something like this before?

A Possibly, this is not the first time we have issued guidance on these issues, but our standards are continually improving and the new document reflects this, containing all that is considered best practice in the public sector.

Q Is that it then?

A More or less, but the Council believes that the issues addressed are very important and we aim to remind you about them at suitable intervals.



Executive Summary

Executive Summary

Sound systems of public accountability are vital to effective management and in maintaining public confidence. Cheshire West and Chester Council share these high standards and are committed to protecting the public funds entrusted to it.

The minimisation of losses to fraud and corruption is essential to ensure that resources are used for their intended purpose to provide services to the citizens of our borough.

The Anti-Fraud and Corruption Strategy is based on a series of comprehensive and inter-related procedures, designed to prevent, detect and deter fraud and to take effective action against any attempted or actual fraudulent act affecting the Council.

It outlines the Council's commitment to creating an anti-fraud culture, and maintaining high ethical standards in its administration of public funds

This Strategy has been separated into 5 sections;

Introduction

- An introduction to the Anti-fraud and Corruption Strategy, including Scope of this document. It outlines the Council's responsibility as an Employer and as a service provider
- Brief synopsis of the strategy and how it will be implemented throughout the Council including responsibility for implementation and building an effective anti-fraud culture.

Corporate Anti-Fraud and Corruption Policy

- A definitive statement of individual responsibilities relating to identifying and reporting incidences of fraud
- Guidelines for investigations and, when necessary, prosecution of perpetrators
- Conclusion, including a list of potential fraudulent activities.

Whistleblowing

- An overview of the corporate Whistleblowing policy including aims and objectives of the policy
- An outline of safeguards to prevent malicious allegations and ensure confidentiality
- Responsibility of senior officers to investigate claims made through corporate Whistleblowing policy and guidelines for conducting such investigations

Anti Fraud and Corruption Response Plan for Staff and Managers

- Additional guidelines for Senior Managers when considering investigations into allegations of fraud and corruption
- Terms and conditions for involving third party interest [Police etc]

Anti Fraud and Data Matching Strategy

- Details of how Cheshire West and Chester approach data matching work



Section 1 Introduction to the Anti-Fraud and Corruption Strategy

Introduction

This Anti-Fraud and Corruption Strategy outlines the Council's commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds.

The Strategy is designed to advise and guide both Members and Employees on the Council's approach to the serious issue of fraud and corruption.

It is designed to prevent, detect and deter fraud and to take effective action against any attempted or actual fraudulent act against the Council.

Scope

This strategy covers all employees and Members of the Council.

The Council also expects that all individuals and Organisations with which it comes into contact, will act with integrity and without thought or actions involving fraud or corruption.

Definitions

For the purpose of this document, the following definitions apply;

The Fraud Act of 2006 gives us a legislative definition of fraud as the intention to make gain or cause loss by false representation, failing to disclose information, or abuse of position.

Fraud is not restricted to monetary or material benefit. In addition fraud can be distortion of statement or records to mislead or misrepresent and for the purposes of this strategy covers theft and failure to disclose an interest in order to gain financial or pecuniary gain.

Fraud is a deliberate act by an individual or group of individuals and is therefore always intentional and dishonest.





The Fraud Act 2006 created three main offences of fraud;

- A person dishonestly makes a false representation
- Wrongfully fails to disclose information
- Abuses a position of trust,

In each case, the Defendant's conduct must be dishonest and his intention must be to make a gain, or cause a loss or the risk of a loss to another.

Corruption is defined as the offering, soliciting or acceptance of an inducement or reward which may influence the action of any person.

The Bribery Act criminalises the offering, paying, requesting or receiving of bribes. It prohibits bribery in both the public and private sectors.

Responsibilities for implementation of this strategy;

Audit Management, in delivering the Internal Audit function to the Council, has the key function of monitoring the effectiveness of internal controls in operation. This also includes carrying out investigations into suspected cases of fraud or corruption. Fraud and corruption can be reported in a number of different ways which are outlined in the Anti Fraud and Corruption Response Plan for Staff and Managers.

The purpose of this Strategy is to outline the Council's approach, as well as defining roles and responsibilities, for dealing with the threat of fraud and corruption, both internally and externally.

It is management's responsibility to prevent and detect fraud. This is achieved by the establishment of sound systems of internal controls designed to reduce the risk posed by fraud within service areas.

All managers must share responsibility for prevention and detection of fraud; it is their responsibility, with the support of relevant services, to ensure that there are mechanisms in place within their area of control to:

- Assess the risk of fraud
- Promote employee awareness
- Educate employees about fraud prevention and detection.



The Authority has a range of interrelated policies and procedures that provide an effective deterrent to fraudulent activity and provide the means for reporting or detecting fraud or corruption.

These have been formulated in line with appropriate legislative requirements, and include:

- The Council's Constitution
- Finance and Contract Procedure Rules
- Codes of Conduct for members and officers
- Accounting procedures and records
- Sound internal control systems
- Effective internal audit
- Effective recruitment and selection procedures
- Disciplinary Procedure
- Anti-Fraud and Corruption Response Plan
- Benefit Fraud Prosecution and Sanction Policy
- Confidential Reporting (Whistle Blowing) Policy
- The Regulation of Investigatory Powers Act (RIPA) Procedure

Environment and culture

Cheshire West and Chester Council's endorsement of this strategy sends a clear message that fraud against the Council will not be tolerated, and where reported or identified will be dealt with in a professional and timely manner using all the sanctions available.

The prevention and detection of fraud and corruption and protection of the public purse are everyone's responsibility. Concerns must be raised when members or employees reasonably believe that one or more of the following has occurred, is in the process of occurring or is likely to occur;

- A criminal offence
- A failure to comply with a statutory or legal obligation
- Improper unauthorised use of public or other funds
- Improper unauthorised use of Council assets and resources
- Falsifications of any document for monetary or pecuniary advantage
- A miscarriage of justice
- Maladministration, misconduct or malpractice
- A deliberate concealment of any of the above

Cheshire West and Chester will ensure that any allegations received in any way, including those made anonymously, will be taken seriously and investigated in an appropriate manner.

The Council will deal swiftly and firmly with those who defraud the authority or who are corrupt.

There is, of course, a need to ensure that allegations are made in good faith and therefore any frivolous allegation could result in disciplinary action.

When fraud or corruption has occurred because of a breakdown in the authority's systems or procedures, Directors will ensure that appropriate improvements in controls are implemented to prevent a reoccurrence.

To assist all staff in their awareness of this approach to fraud, management will ensure;

- Participation in training programmes covering fraud detection and prevention
- Ensure staff understand internal controls are designed and intended to prevent and detect fraud
- Encourage staff to report suspected fraud directly to those responsible for investigations without fear of disclosure or retribution (see Whistleblowing)

Prevention and Deterrence

The Council recognises that fraud and corruption are costly, both in terms of reputation risk and financial losses. The prevention of fraud is therefore a key objective of the authority and respective roles and responsibilities are outlined below.

Recruitment

A key preventative measure in the fight against fraud is the effective recruitment of staff. Cheshire West and Chester Council recognise through its employment procedures that effective recruitment and staff vetting arrangements are essential to ensure the integrity of all new staff. These include

- the screening of identity documents,
- references and qualifications for new employees,
- Criminal Records Bureau checks for appropriate posts,



- Detailed appraisal of employees' performance and ability during probationary periods and throughout their entire employment.

For certain posts, the Council will undertake checks on potential new employees, to ascertain whether they are/ have been falsely claiming Housing and/or Council Tax Benefit. These posts are based in the Benefits, Housing and Council Tax areas plus any additional posts the relevant Director considers appropriate.

Staff development and training

Courses and awareness sessions on the topics of raising awareness of fraud, fraud detection and fraud prevention will be developed in conjunction with the Head of Internal Audit and management as necessary.

Managers should encourage the completion of the Fraud Awareness training module on I-West as a core part of staff development and induction.

An Anti fraud handbook is also available to all staff (insert link here).

The Anti Fraud and Corruption Strategy

The complete Anti fraud and corruption strategy is detailed in this booklet.

It outlines;

- The Council's commitment to building and maintaining an anti fraud and corruption culture and respective roles of individuals in order to achieve this
- Mechanisms in place to prevent, detect and investigate fraudulent and corrupt activities
- Further guidance available

It is vital to any public sector body that staff at all levels are fully aware of their responsibilities and how to discharge them.

Accordingly this Strategy have been split into the following sections

- Corporate Anti Fraud and Corruption Policy
- Whistleblowing Procedures
- Anti-Fraud Response Plan for Staff and Managers
- Anti-Fraud and Data Matching Strategy

Conclusion and Review of this Strategy

Cheshire West and Chester have in place a clear network of systems and procedures to assist in the fight against fraud and corruption. It is essential that these arrangements keep pace with future developments, in both preventative and detection techniques.

The Council will maintain a continuous overview of such arrangements and regularly reviews Rules of Procedure, Finance and Contract Procedure Rules, and codes of conduct, financial procedures and internal/external audit arrangements

To this end this strategy will be subject to update of its contents at appropriate intervals.

For any advice, assistance or to raise your concerns in confidence please contact:

Helen Peters,
Principal Financial Advisor - Investigations
Tel: **01244 97 7375**
Email: **helen.peters@cheshirewestandchester.gov.uk**

Alternatively you can ring the **Whistleblowing hotline**
Tel: **01244 97 3223**
Email: **whistleblowing@cheshirewestandchester.gov.uk.**



Section 2 Corporate Anti Fraud and Corruption Policy

1. Introduction

1.1 Cheshire West and Chester's gross expenditure for 10/11 will be in the region of £740 million. As with other large organisations the size and nature of the service puts the council at risk of loss due to fraud and corruption both from within and outside the Council

1.2 It is acknowledged as best practice that public sector bodies introduce and adopt a Corporate Anti Fraud and Corruption Strategy.

1.3 In order to protect public funds against fraud and corruption, Cheshire West and Chester are committed to an effective Anti Fraud and Corruption Strategy and ensuring that the opportunity for fraud and corruption is reduced to the lowest possible risk

1.4 The Council's expectation on propriety and accountability is that Members and Staff at all levels ensure adherence to statutory and internal rules and regulations, procedures and recommended practices.

2. Policy Statement

2.1 Chester West and Chester requires all staff and elected Members to act honestly and with integrity at all times and to guard the resources for which they are responsible.

2.2 Fraud can pose a significant threat to these resources and must therefore be a concern to all staff and elected members.

2.3 The purpose of this Policy document is to set out specific responsibilities with regard to prevention and detection of fraud.

Director of Resources (Section 151 officer) has a statutory responsibility to;

- Ensure proper arrangements are made for the Council's financial affairs.
- Is required to maintain an adequate and effective internal audit of its financial records and systems of internal control.





Head of Legal and Democratic Services, (Council's Monitoring Officer) is required to;

- Prepare a report to Council where it appears that the authority has or is about to do anything which would be in contravention of the law or which would constitute maladministration.

Senior Managers are responsible for;

- Ensuring that adequate systems of internal control exist within their areas of responsibility, and that such controls, checks and supervision operate in such a way as to prevent or detect fraudulent activity.
- The "separation of duties" (this is the practice of dividing steps in a system function among different individuals, so as to keep a single individual from perverting the process) is considered a fundamental control in such systems, especially when involving significant transactions.
- primary responsibility for the prevention and detection of fraud
- Regularly need to assess the types of risks and scope for potential fraud associated with the operations in their area.
- Ensure that all staff receive fraud awareness training. The level and extent of this will depend on the work that individual employees carry out.
- Remind employees who are an integral part of the control framework of fraud and risk issues.

Employees are responsible for;

- a duty to act if they believe there is a possibility of fraud, corruption or poor value for money taking place or the rules are being breached
- Their own conduct and for contributing towards the safeguarding of corporate standards (including declaration of interest, private working, Whistleblowing etc)
- Acting with propriety in the use of official resources and in the handling and use of corporate funds whatever they involve.
- Be alert to any financial transactions that may suggest money laundering (separate procedures are available for cases of possible money laundering).



Internal Audit is responsible for;

- Providing a pro-active corporate anti-fraud function to facilitate the identification and subsequent investigation of alleged acts of fraud or corruption.
- Investigation into any and all investigations of fraud and corruption that do not fall within the remit of other investigative bodies such as Housing Benefit Fraud Team.
- Receiving and reviewing notifications of all frauds reported within the Council, monitoring all investigations and analysing fraud risk.
- making appropriate arrangements to co-ordinate the Council's work on the Audit Commission's National Fraud Initiatives
- Undertake internal data matching across council systems. (see Data Matching Policy)
- reporting to and liaising with the local police on individual cases
- Issuing guidance to members and management in relation to fraud and corruption related legislation and procedures.
- Promoting Fraud Awareness and training
- Acting as the Council's consultant on issues of fraud and corruption

External Audit are responsible for:-

- stewardship of public money
- Considering if the Council has adequate arrangements in place to prevent and detect fraud and corruption

Benefit Fraud Team is responsible for;

- investigating allegations of Housing and/or Council tax benefit fraud
- prosecution or sanction of such offenders

Elected Members are responsible for;

- Their own conduct
- Contributing towards the safeguarding of corporate standards, as detailed in the Members Code of Conduct.

Cheshire West and Chester Council is accountable to all people in the borough and is responsible for conducting its business in an open, honest, equal and fair manner. In doing so, it will take positive action against any identified fraudulent or corrupt activities.

Abuse of the Council's assets or services will not be tolerated and everyone is therefore encouraged to report any suspicions or knowledge they may have regarding any acts of fraud and corruption being perpetrated against the Council. Any information will be treated confidentially and professionally, and will be responded to in a timely manner.

Principles of Conduct

Cheshire West and Chester Council believe that a culture of honesty and openness is a key element in tackling fraud.

The Code of Conduct for members and Staff is based on the Nolan principals of Standards in Public Life.

1. **Selflessness:** Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
2. **Honesty and Integrity:** Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
3. **Objectivity:** In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
4. **Accountability:** Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
5. **Openness:** Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
6. **Honesty:** Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
7. **Leadership:** Holders of public office should promote and support these principles by leadership and example.



3.0 Definitions

3.1 An irregularity is any action that breaches the required high standards of financial integrity expected by the public.

3.2 A number of definitions are relevant but fall broadly into the following categories

1. Fraud - the intention to make gain or cause loss by false representation, failing to disclose information, or abuse of position.

2. Theft - the dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it.

3. Corruption - is defined as the offering, soliciting or acceptance of an inducement or reward which may influence the action of any person.

4. Bribery which states that this crime is committed when a bribe is given or offered to induce a public official to fail to act in accordance with his duty, or with the intention to produce any effect at all on the decision of a public officer.

5. Irregularity is a very broad term, which may be defined as a failure to observe financial regulations, standing orders, codes of conduct and other recognised codes of practice.

4. Corporate Framework

4.1 Cheshire West and Chester has a range of interrelated policies and procedures that provide an effective deterrent to fraudulent activity and provide the means for reporting or detecting fraud or corruption.

4.2 These have been formulated in line with appropriate legislative requirements and it is important that all Members and Staff know about them.

4.3 They include:

- The Council's Constitution
- Finance and Contract Procedure Rules
- Codes of Conduct for members and officers
- Accounting procedures and records
- Sound internal control systems
- Effective internal audit
- Effective recruitment and selection procedures
- Disciplinary Procedure
- Anti-Fraud and Corruption Response Plan

- Benefit Fraud Prosecution and Sanction Policy
- Confidential Reporting (Whistle Blowing) Policy
- The Regulation of Investigatory Powers Act (RIPA) Procedure

4.4 Senior Managers must ensure that all staff have access to the relevant rules and regulations and that staff receive suitable training.

4.5 Members and employees must ensure that they read and understand the rules and regulations that apply to them and act in accordance with them.

5. Prevention of Fraud and Corruption

Regulatory Framework

5.1 Cheshire West and Chester Council have a wide range of mechanisms in place aimed at the prevention and detection of fraud and corruption. These include the main rules and regulations set out in this document in addition to the financial procedure rules.

5.2 Rules and regulations must be regularly reviewed and updated to reflect changes in circumstances

5.3 Managers must ensure that adequate levels of internal checks are included in working procedures, particularly financial procedures. It is important that duties are organised in such a way that no one person can carry out a complete transaction without some form of checking or intervention process being built into the system.

National Fraud Initiative (NFI)

5.4 Cheshire West and Chester Council is committed to participation in the Audit Commissions National fraud Initiative (NFI) conducted every 2 years.

5.5 The Council provides information obtained from relevant databases (as directed by the Audit Commission) for matching against similar information of other Local Authorities.

Working with Others

5.4 Cheshire West and Chester is committed to working and cooperating with other organisations to prevent



organised fraud and corruption. Wherever possible and legal the Council will assist and exchange information with other appropriate bodies to assist in investigations to combat fraud.

5.5 Cheshire West and Chester will consider joint working with certain agencies, including (but not limited to);

- Other Local Authorities
- Department for Work & Pensions
- Local Police
- Border Agency

6. Detection and Investigation

6.1 It is the responsibility of Directors and managers to maintain good control systems and procedures, and ensure that all staff comply with such instructions.

6.2 Investigations will be carried out in response to referrals of potential fraud.

6.3 Proactive exercises will be conducted in targeted services areas where there is considered to be a high risk from fraud.

6.4 Data from different sources available within the Council are matched as an effective way to identify potential fraud and error. This is carried out in compliance with the Data Protection Act.

6.5 When information relating to fraud or corruption is obtained it is reviewed and subject to a risk assessment. Some are followed up with a full investigation; others are better dealt with as management issues. Where appropriate Directors and managers shall:

- report all allegations to Internal Audit
- report allegations swiftly and follow any guidance provided;
- where appropriate, contact other agencies, e.g. the Police; and
- report to senior management, and where appropriate, support the Council's disciplinary procedures

6.6 Depending on the nature and anticipated extent of the information obtained, internal audit will normally work closely with:

- Directorate Management
- Human Resources
- Legal Services



- Other agencies, such as the Police and the Department for Work and Pensions

6.7 This is to ensure that all allegations and evidence are properly investigated and reported upon, and that where appropriate, losses are recovered for the Council.

6.8 Where appropriate this will include the use of Proceeds of Crime legislation.

6.9 Where financial impropriety is discovered relating to employees, members, partner organisations, the matter may be referred to the Police in accordance with the Anti-Fraud and Corruption Response Plan. Referrals to the police may be made by the Director of Resources or by the Head of Internal Audit. Referral to the police will not prohibit subsequent or concurrent action under the disciplinary procedure.

6.10 The Council's External Auditor, the Audit Commission, also has powers to independently investigate fraud and corruption.

7. Deterrence

7.4 There are a number of ways in which we deter potential fraudsters from committing or attempting fraudulent or corrupt acts, whether they are inside or outside of the Council, and these include:

- Publicising the fact that the Council is firmly set against fraud and corruption at every appropriate opportunity.
- Acting robustly and decisively when fraud and corruption is suspected
- Prosecution of offenders.
- Taking action to effect maximum recovery for the Council



- Use of the Proceeds of Crime Act where appropriate to maximise the penalty and the level of recovery by the Council.
- Having sound internal control systems, that still allow for innovation and efficiency, but at the same time minimising the opportunity for fraud and corruption.

Training and Awareness

7.2 It is the responsibility of Directors to communicate the Anti-Fraud and corruption Strategy to their staff, and to promote a greater awareness of fraud within their departments

7.3 The Council supports the concept of induction training, particularly for officers involved in internal control systems, to ensure that their responsibilities and duties in this respect are regularly highlighted and reinforced.

Disciplinary

7.4 Acts of 'fraud, theft or other criminal acts' are examples of gross misconduct.

7.5 Officers who deliberately ignore guidance on anti fraud matters may be subject to disciplinary procedures.

Whistleblowing

7.6 Cheshire West and Chester Council operate a Whistleblowing Policy (see section 3) which is intended to encourage and enable staff to raise serious concerns.

7.7 Staff who report concerns will be supported and protected from reprisals. Everything will be done to protect confidentiality. They will be advised of the action that has been taken as far as the law will allow.

7.8 Head of Legal and Democratic Services as the Council's Monitoring officer has overall responsibility for the maintenance and operation of the Whistleblowing policy.

8. Conclusion

8.1 Cheshire West and Chester Council is determined that the culture of the organisation represents honesty and integrity, and opposition to fraud and corruption.

8.2 The Council will target and combat all identified or suspected instances of fraud or corruption including (but not limited to);

- Financial irregularity
- Misuse of office
- Corruption
- Collusion
- Theft
- Bribery
- Stealing supplies
- Working for another employer whilst on sick leave
- Falsifying records (such as time sheets)
- Failure to declare an interest
- Fraudulent tendering process

8.3 The Council has in place a clear network of systems and procedures to prevent fraud and corruption and these arrangements will need to keep pace with future developments in techniques for preventing and detecting fraudulent or corrupt activity that may affect its operation, and as such will regularly review our anti-fraud and corruption arrangements.



Section 3 Whistleblowing Policy

1. Introduction

1.1 As an employee, Member or contractor, supplier to or consultant with, the Council you may, from time to time, witness practices that seem suspicious. However, you may be deterred from expressing your concerns because you fear harassment or victimisation. You may feel that it may be easier to ignore the concern rather than to report your suspicions.

1.2 The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we encourage employees and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns without fear of reprisals. This policy document makes it clear that you can do so, without the fear of victimisation, subsequent discrimination or disadvantage.

1.3 These procedures are intended to encourage and enable you to raise serious concerns within the Council rather than overlooking a problem or 'blowing the whistle' outside. Premature or unnecessary publicity may damage the Council's reputation, impede proper investigations, or hurt individuals unnecessarily.

1.4 A Member shall not disclose confidential information, using the public interest exemption in the Council's Member Code of Conduct without first considering using the procedure in this Whistle Blowing Protocol to raise concerns about an issue, unless it is necessary for the disclosure to be made to the Police or a Regulatory Body.

2. Purpose & Scope

2.1 These procedures have been introduced to provide employees, Members and contractors, suppliers or consultants with a secure basis for reporting suspicions of impropriety, in the knowledge that the matter will be treated confidentially.

2.2 This policy covers the reporting of a malpractice, the information that will need to be recorded and the steps that need to be followed to ensure that you do not suffer any recriminations or victimisation.

2.3 These procedures are intended to supplement, rather than replace, existing Council policies and procedures (for example the Council's grievance procedures and the policies dealing with harassment) whereby employees of the Council may already raise complaints or matters of genuine concern with the Council. They are therefore designed to provide for those instances where the person reporting the matter feels that, for any reason, they cannot make use of other procedures.

2.4 This policy has been designed to take into account Human Rights considerations.

3. Contractors, Suppliers And Consultants

3.1 In your dealings with the Council you will often work very closely with Council employees and Councillors. You will also operate under the Council's procedures and policies. The Council is fully aware that if you notice anything suspicious, or come across malpractice, you may be concerned about your relationship or future relationship with the Council if you raise this. As with employees and Councillors, the Council wants to encourage you to voice any concerns you may have, secure in the knowledge that the matter will be taken seriously and investigated, and that you and your organisation will not suffer any disadvantage.

4. Legislation

4.1 The Public Interest Disclosure Act 1998 has been introduced to protect employees who expose serious wrongdoing in the workplace. It applies where a malpractice is disclosed involving:

- a crime or breach of regulatory, administrative and common law;
- a miscarriage of justice;
- danger to health and safety;
- damage to the environment;
- unauthorised use of public funds;
- possible fraud and corruption; and
- sexual, physical or financial abuse of clients



4.2 The Act protects you from victimisation where you reasonably believe the information, and are acting in good faith.

4.3 A disclosure is protected if you have an honest and reasonable suspicion that a malpractice has occurred, is occurring or is likely to occur. As an employee you can raise the matter with your line manager who will refer it to one of the named below, or if you prefer direct to:

- Head of Paid Service (Chief Executive);
- Monitoring Officer (Head of Legal and Democratic Services);
- Director of Resources; or
- Audit and Risk Manager

4.4 Councillors can report suspicions to any of the above four officers.

4.5 A confidential record will be maintained by the Audit and Risk Manager of all concerns raised (except if the complaint is against the Audit and Risk Manager's team).

4.6 It is important to note that in response to concerns raised with any of the above, they will initially act independently of each other when making investigations, except for the Audit and Risk Manager who may be asked to carry out the investigation.

5. Safeguards

Harassment Or Victimisation

5.1 The Council is committed to good practice and high standards, and wants to be supportive of employees.

5.2 The Council recognises that the decision to report a concern can be a difficult one to make. It will not tolerate any harassment or victimisation and will protect you if you raised a concern in good faith.

5.3 If you happen to be involved in any disciplinary or redundancy procedures these will be kept separate from the investigation of your complaint.

Confidentiality

5.4 The Council will protect the confidentiality of all matters raised by concerned employees and Councillors.



5.5 If there is any breach of confidentiality by any of the four named officers in paragraph 4.3, the employee raising the concern can take the appropriate action under the grievance procedures.

Anonymous Allegations

5.6 This policy encourages you to put your name to your allegation whenever possible.

5.7 This is because concerns expressed anonymously are much less powerful than those raised by an identified individual. Anonymous allegations will, however, be considered at the discretion of the Council.

5.8 In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

6. Untrue Allegations

6.1 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, as an employee you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you. In the case of Members, the Standards Committee will consider the matter and make recommendations to the Council.

7. Procedures

Raising a Concern

7.1 You can raise your concern orally, (i.e. face to face or over the phone) or in writing. If you write, mark the envelope 'personal, private and confidential' and if the concern is of a serious nature, hand deliver the envelope to the person you wish to report the matter to.

7.2 Whichever way you choose, please give as much information as you can. Remember also to give your name, job and say if you do not want to be contacted at work (if so, give your home address and phone number).

7.3 You should include the following:

- background information;
- information as to why you are concerned;
- details of any other procedures which you have already used, and what happened;
- the names of the employee / Members involved and where they work (if applicable);
- dates or periods of time relating to the matter;
- the names and jobs of any other employees / Members who may support your concern.

7.4 The earlier you express your concern, the easier it will be to take action.

7.5 Although you will not be expected to prove beyond doubt the truth of an allegation, you will need to demonstrate that there are reasonable grounds for the concern.

7.6 You may find it easier to raise the matter jointly if there is another employee / Member who has the same concern, and will support your allegation.

7.7 You would be advised to invite your trade union representative, or another person, to be present during any meetings or interviews in connection with the concern raised. In this case you can remain anonymous when the concern is first raised, but you may have to be involved personally if the matter goes further.

8. HOW THE COUNCIL WILL RESPOND

8.1 One of those named in paragraphs 4.3 will firstly decide whether to carry out an investigation and determine which Council procedure it is appropriate to use.

8.2 If it is decided that the matter should be taken further under Whistleblowing procedures, the concern raised will be:

- investigated by the Monitoring Officer, Management or Audit & Risk Management;
- referred to the police;
- referred to the external auditor;



- considered to become the subject of an independent inquiry;
- considered under the Council's Member Code of Conduct.

8.3 You may be interviewed by the person investigating the matter.

8.4 In order to protect individuals accused of a possible malpractice, enquiries will be made to decide whether an investigation is appropriate. Some concerns may be resolved by agreed action without the need for an investigation. If urgent action is required, this will take place before an investigation is undertaken.

What You Will be Told

8.5 The person to whom you have raised your concern will contact you in writing within 10 working days detailing the following:

- acknowledging that the concern has been received;
- indicating how the Council intends to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- detailing any initial enquiries that have been made; and
- informing you whether further investigations will take place (and if not, why not).

8.6 The amount of contact you have with the people considering the matter will depend on the type of concern, the potential difficulties of the investigation and the availability of information. Wherever possible, you will be told the final outcome of any investigation.

8.7 The Council will take steps to minimise any difficulties you may experience as a result of raising a concern. For example, if required to give evidence in criminal or disciplinary proceedings, the Council will arrange for you to receive advice about the procedure.

9. THE RESPONSIBLE OFFICER

9.1 The Council's Monitoring Officer has overall responsibility for the maintenance and operation of this policy.

10. If You Are Not Satisfied With The Council's Response

10.1 This procedure is meant to give everyone an effective way to raise a concern within the Council (and if possible resolve it internally). However, if you are still unhappy after using the procedure (and getting a final written response) you are entitled to consider taking your concern elsewhere. If you do this, these are some of the contacts that are available:

- the Council's external auditors – 01244 972521
- UNISON Whistle blowing Hotline – 0800 597 9750
- Audit Commission Anti Fraud and Corruption Unit – 0207 630 1019
- The independent charity Public Concern at Work – 0207 404 6609
- a Citizens Advice Bureau
- the Standards Board for England – 0845 0788181
- a relevant professional or regulatory body
- a relevant voluntary organisation
- the police



Section 4

Anti Fraud and Corruption Response Plan for Staff and Managers

1. Introduction

1.1 This document provides guidance to employees and management in the event of their becoming aware of, or suspecting a fraud or corrupt act being committed in Cheshire West and Chester by a Councillor, member of staff, contractor or a supplier.

1.2 A one page flowchart is also included at the end of this document, to provide an at-a-glance summary of the process.

2. Objectives

2.1 The objectives of a fraud response plan are to ensure that timely and effective action can be taken to:

- ensure there is a clear understanding over who will lead any investigation and to ensure local managers, Audit and Personnel are involved as appropriate;
- prevent further losses of funds or other assets where fraud has occurred and maximise recovery of losses;
- ensure there is substance and evidence to support any allegation against an employee before that employee is subject to disciplinary action;
- minimise the risk of inappropriate action or disclosure taking place which would compromise an investigation or recovery of losses;
- secure evidence and ensure containment of any information or knowledge of any investigation into the matter reported;
- identify the perpetrators and maximise the success of any disciplinary / legal action taken; and
- Minimise any adverse publicity for the Council.

3. Employee Responsibilities

3.1 As an employee, there are a number of actions you may be required to take depending on who is involved in the fraud or corruption. You should remember, however, that when you know of or suspect a fraud or corrupt act you must not discuss it with other work colleagues either before or after reporting it to the appropriate person.

3.2 You should never confront the suspected individual or act in a manner which might draw their attention to your suspicions.

3.3 At the earliest opportunity you should clearly record all the activities you have witnessed and information you have received or are aware of. It is important to record as much information as possible to inform any subsequent management assessment or investigation, including dates, times and sequences of events.

Fraud by another Council employee

3.4 If a work colleague is giving rise to suspicions that s/he is committing a fraudulent or corrupt act within their area of work, then under normal circumstances you should report it to your line manager. However, you may not wish to report to your line manager, particularly if you suspect them of committing the fraud or corrupt act, or having an involvement in what you have observed. Therefore, the option exists to report to any of the following officers:

- Your line manager's manager (your "grandparent" manager);
- Your Head of Service or Director;
- The Head of Internal Audit or
- The Investigations Manager (part of the Council's Internal Audit team)

3.5 If the suspicion relates to matters which do not relate to your colleague's normal work, but you still suspect fraudulent or corrupt behaviour, then the reporting action should follow that for a member of the public (see 3.7).

Fraud by an elected Member

3.6 If you need to report a suspicion or an actual fraud or corrupt act by a Councillor, you should report this to one of the following officers in the Council:

- the Head of Legal & Democratic Services, who is the Council's Monitoring Officer;
- The Head of Internal Audit or
- The Investigations Manager



Fraud by a contractor, supplier or a member of the public

3.7 If the fraud or corrupt act is being committed in your Service area, then under normal circumstances you should report your concerns to your line manager. If your suspicions do not relate directly to your area, then you should not ignore the information you have, but should report the matter directly to the Head of Internal Audit or the Investigations Manager. This could include information that comes into your possession through your profession or social life.

Whistleblowing policy

3.8 The Council has developed this Whistleblowing policy (also available on the intranet) in accordance with the provisions of the Public Interest Disclosure Act 1998. The policy provides employees with a method of raising concerns about any financial or other malpractice in the Council.

4. Councillors' Responsibilities

4.1 Where Councillors come into possession of information which may indicate that a fraudulent or corrupt act is being perpetrated against Cheshire West and Chester Council, they must report this to either the Chief Executive, the relevant Director, or the Monitoring Officer (Head of Legal & Democratic Services). The officer in receipt of the report should ensure that any subsequent investigation follows the requirements of this fraud response plan.

5. What will happen next?

5.1 When a suspected fraud or corrupt act is reported, a senior officer in the relevant Service will be identified as the Investigating Officer, and in conjunction with the Investigations Manager, will undertake a review of the situation. Where evidence suggests there is a potential fraud, they will undertake a detailed investigation.





5.2 Any conversations you have with, or information that you provide to the investigating officers, will remain confidential. You should remember, however, that the Investigations Manager has a responsibility to investigate all cases of fraud that are referred, with a view to prosecution, and therefore you will might be required to produce a signed written statement that could be used in a disciplinary, civil or criminal investigation.

5.3 Subject to the constraints of Data Protection legislation and the Council's duty of confidentiality to employees and Councillors, you will be given as much information as possible about the outcome of any investigation.

5.4 You must only report genuine concerns and believe the concerns to be true. Any reports which are subsequently determined to be vexatious or malicious could be dealt with as a disciplinary matter.

6. What is Management's role?

6.1 As soon as a complaint or an allegation is received by a manager, it is their responsibility to inform the Investigations Manager or the Head of Internal Audit, and together to undertake an initial enquiry to ascertain the facts. This enquiry should be carried out as quickly as possible, with the objectives of either substantiating or repudiating the allegation that has been made.

6.2 At no time during the preliminary investigation should the manager confront the alleged suspect, nor put evidence at risk. Under no circumstances should a manager discuss a suspected employee fraud with other staff members or peer managers.

6.3 If there are suspicions that similar frauds are or could be being committed the situation should be discussed with the Investigations Manager.

7. How will the investigation proceed?

7.1 Every case is unique. The Investigations Manager will work with the appointed Investigating Officer to ensure the most appropriate course of action is taken. Considerations will include:



- The preparation of an investigation plan;
- The potential requirement to suspend a member of staff, in accordance with the Council's Disciplinary Procedure, while the investigation is undertaken;
- The need to secure evidence (including documents, computer records, CCTV tapes, etc);
- The commissioning of specialists services from both within and outside the Council (e.g. surveillance experts, forensic IT specialists, specific service areas or subject matter experts);
- Carrying out interviews to gather information and witness statements (any interviews must be conducted fairly and in accordance with the Police and Criminal Evidence Act 1984 (PACE), and will, where possible, be tape-recorded);
- Potential referral to other internal or external agencies, e.g. Housing Benefit Fraud team, the Department for Work & Pensions, the Police.

8. Investigation outcomes

Allegations against an employee

8.1 If an allegation is substantiated following an investigation, the matter will be reported to Human Resources for disciplinary proceedings to proceed.

8.2 At the same time, if there is evidence that fraud has been committed against the Council, the Head of Internal Audit will formally consider referring the matter to the Police, and liaise with them over whether formal charges will be brought and an investigation taken forward to possible prosecution. A referral to the Police will be carried out following consultation with the Director of Resources and the Head of Legal & Democratic Services.

8.3 In appropriate circumstances the Council will consider taking civil action against the accused employee to recover any debt caused as a result of their actions.

Allegation against a Councillor

8.4 Any allegations against a Councillor must be made to the Head of Legal and Democratic Services in their role as Monitoring Officer.

Allegation against a contractor or supplier

8.5 If an allegation of fraud against the Council by a contractor or supplier is substantiated, the basis of the action taken will follow a criminal prosecution route.

8.6 In addition to the criminal route, wherever applicable, the action taken by the Council will also follow a civil route, in order to recover assets or monies obtained by the potential offender. All significant losses will be reported to the Asset Recovery Agency who has powers to freeze and recover assets related to the proceeds of crime.

External Audit

8.7 In some cases it may be necessary to immediately inform the Council's External Auditor of the fraud or corruption. This will be the responsibility of the Head of Internal Audit.

Press and publicity

8.8 The Marketing and Communications Service will deal with the press and publicity in all matters regarding fraud and corruption. Where appropriate the details of all successful prosecutions for fraud will be released to the media through the Marketing and Communications Team. Staff and Managers must not directly disclose to the press the details of any cases suspected or under investigation.

8.9 Disclosure of details to the media without the express authority of the Marketing and Communications Team could be regarded a disciplinary matter. The aim is to publicise the Council's intolerance of fraud or corruption both within the Council and by users of its services. It also serves to publicise our successes against those who would perpetrate such fraud or corruption against the Council.

9. Conclusion

9.1 The Anti-Fraud and Corruption Response Plan for Staff and Managers, in conjunction with the Anti-Fraud and Corruption Strategy, the Whistleblowing Policy, the Code of Conduct, and the Employee Disciplinary Code, will support the Council's objectives in countering and investigating corporate fraud and corruption. However no guidance such as this can expect to cover all eventualities and, therefore, if you have any issues or are unsure of the action to take in a given situation you should immediately contact the Head of Internal Audit or the Investigations Manager.



Section 5 Anti Fraud and Data Matching Strategy

1. Introduction

1.1 The benefits of data matching are well documented through government initiatives such as the National Fraud Initiative (NFI) run every two years by the Audit Commission. The NFI forms part of the statutory external audit process for councils, police and fire authorities in England and Wales. Audited bodies and other participating organisations supply data for cross-matching between systems to identify cases where fraud may be occurring.

Better use of information is seen as a key element in the fight to reduce the levels of fraud and error in the public sector.

1.2 Cheshire West and Chester Council (CWaC) is committed to preventing fraud, corruption, reducing the level of financial risk and reducing the number of errors.

1.3 CWaC is continually looking to introduce more efficient and effective techniques to combat fraud. To support the anti-fraud agenda, operational processes within Cheshire West and Chester Audit are designed, where practicable, to add value through data matching practices.

1.4 Investing in improvement is a key priority for the Council to help it to manage resources effectively, flexibly and responsively. Consequently, errors or fraud identified via the data matching route will also help the Council to improve services and the internal control environment - supporting the aspiration to be one of the best run Local Authorities in England.

1.5 The relative cheapness and availability of sophisticated data processing methods means that data matching is likely to increase even more rapidly in the future. By developing a robust Data Matching policy, strategy and procedures, the Council will be well placed to carry out data matching activities in a controlled environment and benefit from a strong, lean and well equipped data matching operation.

2. What is data matching?

2.1 Advances in computer systems and data storage technologies offer the potential for cost effective matching of data stored within electronic data systems.

2.2 Data matching is a:

- primary driver for activities designed to help combat fraud, and
- a technique that makes it possible to detect similarities and/or differences between data that has been collected for different purposes.

2.3 The term 'data matching' covers two related but distinct functions of computerised databases. One is the comparison of a given individual's details (e.g. on an application form) with one or more databases (e.g. to check that Pension income has been properly declared). The other is to perform a 'side-by-side' comparison of two or more databases, to detect trends, anomalies or potential duplicates (e.g. to identify if a person is making more than one Housing Benefit claim across neighbouring Local Authority boundaries).

2.4 While the number and types of public and private data sets continues to grow, more powerful computers and software make it easier to collect and compare information from different sources.

3. Purpose of Strategy

3.1 The Council's aim is to data match only where relevant legislation permits, in order to avoid unlawful processing of data,

3.2 To ensure that a consistent data matching approach is adopted across Cheshire West and Chester Audit by making effective use of a clearly defined strategy and procedures, and

3.3 To put in place appropriate data matching control measures so that the data analysis takes place within a robust approval mechanism.

4. Principles of data matching

- Data is only processed where the required consent for such checks has been obtained. This may include for example a declaration included on documents where data is being collected at source e.g. Benefit Application forms, Taxi License applications.
- Only data actually needed to perform the data matching exercise is collected and processed



- Data matches will be fed into a structured and prioritised programme of activity
- Source and matched data is only seen by staff who need it to do their jobs
- Data is retained only for as long as it is required
- Data is accurate and is only used for the intended purpose
- Decisions affecting individuals highlighted in the data matching routine are made on the basis of reliable and up to date data
- Data matching outputs are fed, where relevant and appropriate, into the Internal Audit planning process

5. Training

5.1 All relevant staff receive appropriate training to provide an assurance that this policy is understood and followed effectively.

6. Implementation

6.1 Internal Audit Management will be responsible for ensuring that this Strategy is implemented.

7. Compliance

7.1 Personal information held by the Council complies with the principles laid down by the Data Protection Act and is in accordance with our registration.

8. Strategy Review

8.1 This strategy document will be reviewed regularly and when relevant legislative changes are enacted.

9. Contact Officer

12.1 For clarification or guidance in connection with this policy, please contact Investigations Manager on 01244 97 7375



Anti Fraud and Data Matching - Our Approach

1. Introduction

1.1 The better use of information and a structure to support its use in the most efficient and effective way are the keys to improving service delivery. This will enable a better focused service using the limited resources at our disposal to provide an enhanced service. By organising more effectively we will be seeking a more targeted approach through the better use of intelligence by using a data warehouse and utilising data matching/mining techniques. It is a key objective to enhance our ability to proactively seek out fraud and error through rigorous, programmed data matching exercises on areas identified as high risk.

1.2 Looking forward, Cheshire West and Chester's Internal Audit's objective is to embrace and expand the use of data matching techniques to identify fraud and error, enhancing the development of data analysis activity.

2. The key objectives of the Data Matching Strategy

The key objectives of the strategy are:-

- Members and Strategic Directors are aware of Cheshire West and Chester Audit's anti fraud and data matching activities
- Members and Strategic Directors give their support and approval to Cheshire West and Chester Audit's anti fraud and data matching activities
- the justification for carrying out the data match is well defined
- the data required is clearly defined
- all relevant data fields are included in the dataset
- output is properly processed.

3. Reasons for Data Matching

3.1 The reasons for undertaking data matching exercises are to:

- prevent and/or detect fraudulent activities
- for the assessment and/or collection of any tax or duty such as Council tax or rent liability
- act in accordance with legislative obligations. For example, Data matching under the National Fraud Initiative is a legal requirement

- highlight errors, inconsistencies, irregularities and/or financial risk
- exploit data held primarily within the Council's Computer Systems to best effect
- make the Cheshire West and Chester Internal Audit planning process more sophisticated and
- improve the Council's internal control environment.

4. Scope of Data Matching

4.1 Data matching may be performed on any Council data system.

4.2 In addition in exceptional circumstances using external systems where deemed appropriate to the furtherance of the Council's anti-fraud objectives and where relevant legislation permits.

4.3 The objective of data matching is to highlight potential areas for further proactive investigation, thereby maximising investigation resources.

4.4 There are two key strands to data matching as follows;

Routine Data matching – scheduled data matches may take place on a daily, weekly, monthly or quarterly basis. Datasets will be collected from core systems in accordance with the annual data matching plan. Also, data collected for routine data matching activities may also be useful as a by-product to drive and support the audit of large information systems.

Ad-hoc data matching – one off requests for data matches may be required for work of a special nature when routine data matching activities would not be appropriate. Also, data collected for routine data matching activities may also be useful as a by-product to drive and support the audit of large information systems.

5. Legal Basis for Data Matching

5.1 For the Council to undertake data matching it must operate within the legislative framework.

- 5.2** Data is matched under the following Legislation;
- National Fraud Initiative - Audit Commission Act 1998
 - Benefit Counter Fraud – Social Security Act.



5.3 In addition to taking part in the National Fraud Initiative (NFI) and Housing Benefit Matching Service (HBMS) data matching exercises

5.4 To support internal pro-active anti-fraud activities, data matching takes place to assist the Section 151 officer achieve their responsibilities. These are outlined in the Local Government Act 1972 and supported by the internal audit right of access stated in the Accounts and Audit Regulations 2003 (as amended 2006).

6. Approach to data matching

6.1 Based upon information obtained from risk analysis work and audit work, an annual data matching plan will be created. The plan will include routine data matching events and leave appropriate contingency to process ad-hoc data matches as their requirement occurs. Risk analysis will be performed from historical information and data trends. Areas with a high fraud risk profile will be targeted.

6.2 The work carried out between routine analysis and non-routine analysis data matching will also be joined-up with existing Cheshire West and Chester Audit planning objectives.

6.3 The data matching routines will be performed on data that is loaded into a Data Warehouse solution, in the case of Cheshire West and Chester this is currently IDEA, Data Analysis Software.

6.4 All data matches will require a specific approval (via a Terms of Reference document) from the Head of Internal Audit. This will be done prior to approaching the data owner.

6.5 All approvals will require a justification to be produced, outlining the data requirements and data field definitions. This will usually take the form of a Terms of Reference.

6.6 A data matching exercise will involve obtaining data, potentially from any Directorate/Department within the Council and cross matching this data, both to the data of other Directorates/Departments or from a number of different external sources, to identify potential errors or irregularities. Some examples of the main types of data match, and the purpose of each, are set out in the table at

Appendix 1 of this document.

7. Retention of data

7.1 We will ensure that data is not held for longer than is necessary for the purpose it was obtained. In establishing retention and archiving periods we will consider both the possibility of complaints and the legal requirements.

7.2 All successful data matches that result in a fraud referral will be documented and retained in line with normal operating procedures.

7.3 All data refreshes will take place on a regular basis i.e.daily, weekly, monthly or quarterly as relevant to operational needs. Consequently, as the existing dataset will be overwritten, data will only be retained until the following scheduled refresh occurs.

8. Storage of data

8.1 Data is held in secure computer files, which have restricted access

8.2 Manual records will be held securely in locked filing cabinets.

8.3 Output reports and files that do not highlight a match will be securely destroyed.

8.4 Once the data matching exercise has been completed the extracted source data file will be deleted. Matches which do not identify fraudulent activity will also be deleted. Matches which subsequently highlight fraudulent activity will be maintained for analytical review.

9. Links to Audit Controls and Risk Registers

9.1 Where significant fraudulent activities have occurred through poor system controls, the details will be fed to the internal audit team to consider the wider control issues.

9.2 Details may be recorded on Cheshire West and Chester's Risk Management system to help assess the implications on the annual assurance statement and for future trend analysis.

10. Management Action

10.1 Internal Audit will make arrangements for follow-up of all positive data matches where a fraud has occurred.



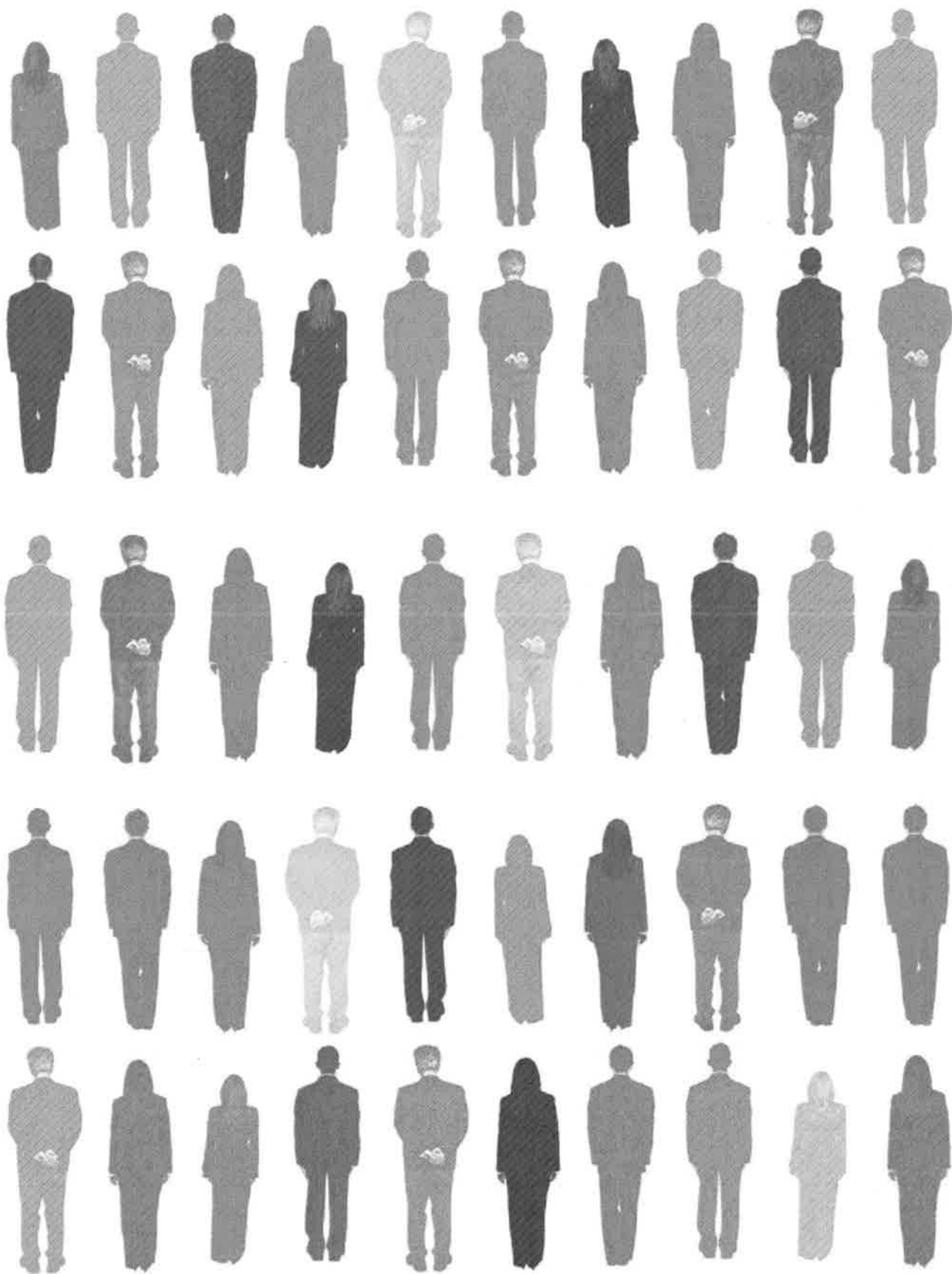
Appendix 1 - Examples of Data Matching

Area	Matched Against	Detail	Tools
Duplicate Payments	N/A	Test payments to identify duplicate payments	Oracle/ IDEA
Payments Review	N/A	Test procedures followed and validity of payments made	Oracle
Creditors	N/A	Addresses containing "c/o", "PO box" or "FAO" Highlight possibilities for interception of payments or identity fraud	Oracle/ IDEA
Creditors	N/A	Duplicate bank account details. Identity fraud or double-dipping for payments	Oracle/ IDEA
Creditors	N/A	Validate creditor VAT numbers Identify possible fraudulent use of VAT numbers/ charges	Oracle/ HMRC website
Housing Benefit	Payroll	New Starters – ensure declarations of Income	Academy/ Oracle/ IDEA
Housing Benefit	Members	Ensure declarations of Income	Academy/ Oracle/ IDEA
Housing Benefit (Addresses/ Bank Accts)	Creditor (Addresses/ Bank Accts)	Inappropriate claims	Academy/ Oracle/ IDEA

This is just a small sample to demonstrate the type of data matching activity that can be conducted.







DON'T TURN YOUR BACK ON **FRAUD**