

Self-Assessment against Government Counter Fraud Standards

	STANDARD		BCC SELF-ASSESSMNET
1.	Have an accountable individual at board level who is responsible for counter fraud, bribery and corruption.	Y	Section 151 Officer owns the fraud risk and the Lead Member for fraud is the Deputy Mayor & Cabinet Member for City Economy, Finance and Performance
2.	Have a counter fraud, bribery and corruption strategy that is submitted to the centre.	Y	The strategy has been in existence for some years with no major changes. There are plans to revise this year.
3.	Have a fraud, bribery and corruption risk assessment that is submitted to the centre.	Partial	<ul style="list-style-type: none"> - Fraud is a corporate risk so is reported on periodically to Cabinet and Executive Board. - Individual Fraud registers are held within the counter fraud team but this need to be embedded within services.
4.	Have a policy and response plan for dealing with potential instances of fraud, bribery and corruption.	Y	Relevant policy and plans in place
5.	Have an annual action plan that summarises key actions to improve capability, activity and resilience in that year.	Y	A planned programme of work has been agreed with CLB and Audit Committee.
6.	Have outcome-based metrics summarising what outcomes they are seeking to achieve that year. For organisations with 'significant investment' in counter fraud, bribery and corruption or 'significant estimated' fraud loss, include metrics with a financial impact.	Y	<ul style="list-style-type: none"> - Proactive fraud plan in place. - Tenancy fraud target set - Fraud delivery plan agreed - Delivering recoverable savings
7.	Have well established and documented reporting routes for staff, contractors and members of the public to report suspicions of fraud, bribery and corruption and a mechanism for recording these referrals and allegations.	Y	<ul style="list-style-type: none"> - Fraud reporting form available on the Source and external web site. - We maintain a fraud hotline and a Whistleblowing hotline and on-line referral process.
8.	Report identified loss from fraud, bribery, corruption and error, and associated recoveries, to the centre in line with the agreed government definitions.	Y	Report twice a year to Audit Committee and CLB.
10.	Have agreed access to trained investigators that meet the agreed public sector skill standard.	Y	Six of the team are trained accredited investigators with ongoing development support in place
11.	Undertake activity to try and detect fraud in high-risk areas where little or nothing is known of fraud, bribery and corruption levels, including loss measurement activity where suitable.	Y	A planned programme of work exists which includes use of analytics and development of the hub and some fraud prevention reviews.
12.	Ensure all staff have access to and undertake fraud awareness, bribery and corruption training as appropriate to their role.	Y	The fraud e-learning module is mandatory for all staff and specific training is regularly provided to staff in high fraud risk areas.
13.	Have policies and registers for gifts, hospitality and conflicts of interest.	Y	Work underway to improve management of conflicts of interest.