



RAISING OUR GAME “TACKLING FRAUD IN WALES”

Position Statement

Theme		What Needs to Happen Next ?	Bridgend County Borough Council (BCBC) Position
Leadership & Culture	R1	The Welsh Government should enhance its strategic leadership of counter-fraud across the public service in Wales, playing a coordinating role where it can, while recognising that individual bodies remain responsible for their own counter-fraud activities.	Individual bodies remain responsible for their own counter-fraud activities.
	R2	All public bodies should champion the importance of a good anti-fraud culture and actively promote its importance to give confidence to staff and members of the public that fraud is not tolerated.	<p>BCBC consistently sets high standards for both Members and Officers and has always dealt with any allegations or suspicions of fraud, bribery and corruption promptly.</p> <p>Policies, procedures and reporting mechanisms are in place to prevent, detect and report on fraud, bribery and corruption. These include:-</p> <ul style="list-style-type: none"> • Fraud Strategy & Framework 2018/19 – 2020/21 • Whistleblowing Policy • ICT Code of Conduct • Anti-Fraud & Bribery Policy • Disciplinary Policy

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			The Fraud Strategy and Framework underpins the Council's commitment to prevent all forms of fraud, bribery and corruption, whether it be attempted externally or from within.
Risk Management & Control Framework	R3	All public bodies should undertake comprehensive fraud risk assessments, using appropriately skilled staff and considering national intelligence as well as organisation-specific intelligence.	<p>The Council acknowledges the risk of fraud and undertakes an assessment on how it prevents, detects, and pursues monies or assets obtained fraudulently and considers how services that are more susceptible manage that risk.</p> <p>Fraud is included in the Chief Executive's Risk Register which is currently being reviewed and updated.</p> <p>Work is ongoing to develop a detailed fraud risk assessment process that links with the corporate risk management process and it is envisaged that this will provide a robust tool to assist in ensuring resources are targeted correctly.</p> <p>It is the intention of the fraud investigator to promote the fact that when new systems and processes are established within the Council contact is made with the Fraud department and/or Internal Audit to try and design fraud out of the system from the start.</p>
	R4	Fraud risk assessments should be used as a live resource and integrated within the general risk management framework to ensure that these risks are appropriately managed and escalated as necessary.	<p>Once fraud risk assessments are developed a suitable process will be established to ensure they are utilised.</p> <p>Internal Audit prepare a risk based annual audit plan and the fraud risk assessment will assist in formulating the plan.</p>
Policies & Training	R5	All public bodies need to have a comprehensive and up-to-date set of policies and procedures, which together represent a cohesive strategy for identifying, managing and responding to fraud risks.	<p>BCBC has policies, procedures and reporting mechanisms to prevent, detect and report on fraud, bribery and corruption. These include:-</p> <ul style="list-style-type: none"> • Fraud Strategy & Framework 2018/19 – 2020/21 • Whistleblowing Policy

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			<ul style="list-style-type: none"> • ICT Code of Conduct • Anti-Fraud & Bribery Policy • Disciplinary Policy <p>An Anti-Tax Evasion Policy is also being drafted</p>
	R6	Staff working across the Welsh public sector should receive fraud awareness training as appropriate to their role in order to increase organisational effectiveness in preventing, detecting and responding to fraud.	<ul style="list-style-type: none"> • The Bridgend intranet has recently been improved and fraud information is being reviewed and updated prior to it being made available to staff. • Fraud information will be made available on the external web page where clear guidance will be provided on how and to who fraud should be reported. • Alerts and newsletters will be developed to raise awareness and notify readers of new and potential fraud risks. This information will also be made available on the fraud pages as they develop. • All service areas including schools will have access to this information. • Fraud awareness training continues to be undertaken by Benefit, Housing Options, Council Tax and Customer Service staff. Fraud awareness also forms part of the induction process for all new Benefits staff. • A new and updated fraud awareness-training package is under development, which can be adapted to meet the needs of different departments across the Council. • Consideration is also underway for the development of bespoke updated/refresher training for Council members. • A Fraud Prevention E-Learning training module has been developed and rolled out providing effective fraud awareness training for Officers and Members. The module is a mandatory requirement for certain staff and teams • Fraud prevention awareness is included in all Corporate inductions going forward with the aim of reducing the

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			<p>instances of fraud by raising awareness and builds on the culture of zero tolerance towards fraud.</p> <ul style="list-style-type: none"> The Finance team has liaised with Tarian (The Regional Organised Crime Unit) to undertake an email phishing exercise and the results were fed back as part of a training session which included raising awareness of the types of fraud being encountered by organisations within the UK. Plans are in place to organise a further, similar session in the new year.
	R7	Cases where fraud is identified and successfully addressed should be publicised to re-enforce a robust message from the top that fraud will not be tolerated.	<p>BCBC actively promotes the fact that fraud will not be tolerated in the workplace or public environment and offenders are advised that any successful prosecutions may be publicised.</p> <ul style="list-style-type: none"> A recent fraud drive into Blue Badge misuse was published in both local and national media. An article about the enforcement operation was also published in 'Parking News' which is distributed across the whole of the UK. Local media channels are advised of successful prosecutions for blue badge offences and Council Tax Reduction fraud. The investigation and prosecution surrounding the fraudulent misuse of a purchasing card was published in the media.
Capacity & Expertise	R8	All public bodies need to build sufficient capacity to ensure that counter-fraud work is resourced effectively, so that investigations are undertaken professionally and in a manner that results in successful sanctions against the perpetrators and the recovery of losses.	<p>BCBC currently employs one full time Senior Fraud Investigator. A new full time Fraud Officer post will be advertised this month.</p> <p>Internal Audit are also involved in fraud including internal investigations and NFI.</p>
	R9	All public bodies should have access to trained counter-fraud staff that meet recognised professional standards.	<p>The Senior Fraud Investigator is qualified as a certified counter fraud specialist holding a Professionalism in Security (PINS) qualification. He is also an Authorised Officer in accordance with</p>

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			<p>the Council Tax Reduction Schemes (Detection of Fraud and Enforcement)(Wales) Regulations 2013 and authorised to enforce or otherwise act for the detection and prevention of Disabled Badge Misuse/Abuse or Fraud on behalf of the Local Authority.</p> <p>Refresher training and new qualifications are considered to ensure skills are maintained. Most recent training undertaken surrounded the emergency grants paid because of the Covid-19 pandemic and covered how to prevent fraud entering the system.</p> <p>In addition, Internal Audit's Audit Client Manager is experienced in all aspects of fraud including internal investigations and is PINS qualified.</p>
	R10	All public bodies should consider models adopted elsewhere in the UK relating to the pooling /sharing of resources in order to maximise the availability of appropriately skilled staff.	<p>The authority is an active member of the Wales wide network of Local Authority Fraud investigators, which provides the opportunity to share knowledge/intelligence/good practice. It also provides the ability to share training and invite specialist guest speakers. It has recently started to discuss the possibility of sharing skills across boundaries.</p> <p>Internal Audit are part of a regional service so knowledge and expertise can also be shared across all 4 participating authorities.</p>
Tools & Data	R11	All public bodies need to develop and maintain dynamic and agile counter-fraud responses, which maximise the likelihood of a successful enforcement action and re-enforces the tone from the top that the organisation does not tolerate fraud.	All counter fraud work including the risk assessment is taken to CMB on a regular basis. There is a commitment to tackle any transgressions, and an ambition to further promote awareness throughout the organisation. The blue badge initiative was endorsed by both CMB and Cabinet and NFI is reported throughout the Council.
	R12	All public bodies should explore and embrace opportunities to innovate with data analytics in order to strengthen both the prevention and	BCBC participates in the biannual National Fraud Initiative co-ordinated by Audit Wales and the Cabinet Office.

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		detection of fraud.	Internal Audit use software to analyse data extracted from Council systems to identify any trends or causes of concern which are then investigated.
Collaboration	R13	Public bodies should work together, under the Digital Economy Act and using developments in data analytics, to share data and information to help find and fight fraud.	<p>The Fraud Investigator is a member of the Wales Fraud Officers Group. This group often shares data and tips on current fraud trends and detection developments. Information exchanged during Covid 19 has been very constructive alerting neighbouring authorities of fraud attempts locally.</p> <p>The Council is a member of the National Anti-Fraud Network (NAFN) where data and information is shared across the UK to help find and fight fraud.</p> <p>BCBC participates in NFI (The National Anti-Fraud Network), has links to CIPFA (Chartered Institute of Public Finance and Accountancy) and has constructive dialogue with Audit Wales</p> <p>The Council always responds promptly to information requests from other agencies and public bodies such as the Police where intelligence and data is often shared under schedule 2 part 1 paragraph 2 of the Data Protection Act 2018 (prevention and detection of crime).</p> <p>Joint working is undertaken with the Department for Work and Pension (DWP) Single Fraud Investigation Service into matters of benefit fraud where Council Tax Reduction is also in payment.</p> <p>BCBC is a member of the Blue Badge Working Group, organised and run by Welsh Government where best practice is shared amongst other Local Authorities in Wales.</p> <p>When fraud is found, it is often shared with other departments</p>

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			within the Council or with other Authorities as necessary.
Reporting & Scrutiny	R14	Public bodies need to collate information about losses and recoveries and share fraud intelligence with each other to establish a more accurate national picture, strengthen controls, and enhance monitoring and support targeted action.	<p>The fraud investigation department records information in respect of Council Tax Reduction Scheme (CTRS) and housing benefit related cases as follows:</p> <ul style="list-style-type: none"> • The number of fraud referrals received • The number of fraud referrals by type • The number of fraud referrals accepted for investigation • The number of referrals not accepted for investigation • Outcomes such as Overpayments/additional liability raised/recovered, CTRS Administrative Penalties, Prosecutions <p>Any system weaknesses identified during the investigation, are considered and remedied if necessary. Feedback is provided to relevant teams so they can further 'fraud proof' their systems.</p> <p>Fraud intelligence is regularly shared with neighbouring Authorities and where necessary the police, HM Revenues & Customs (HMRC) and the DWP.</p> <p>A record of any internal frauds is maintained and is used to identify control weaknesses across service areas or functions.</p>
	R15	Audit committees must become fully engaged with counter-fraud, providing support and direction, monitoring and holding officials to account.	One of the Governance & Audit Committee core functions is to consider the effectiveness of the Council's risk management arrangements, the control environment and associated anti-fraud and corruption arrangements. Regular reports are provided and issues raised to keep Members informed.