

Report for Resolution

Report to Audit Committee
28 November 2008

Report of Head of Finance

Subject Revised Anti-Fraud Strategies

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Purpose

To ask members to consider and approve the revised Anti-Fraud and Corruption Strategy and revised Housing and Council Tax Benefit Anti-Fraud Strategy.

Recommendations

Members are asked to approve the revised anti-fraud strategies.

Financial Consequences

The financial consequences of this report are none directly.

Risk Management

The enhanced anti-fraud strategies are intended to mitigate the risk of frauds against the council and demonstrate the action that will be taken where fraud may have occurred.

Equality Implications

The policy officer has advised on the separate diversity impact assessments, which will be formally reviewed by the sponsorship equalities group on 28 November - until then they are in draft. Once approved they will be published on the council's web site. At this stage the initial assessments conclude that full impact assessments are not necessary.

Strategic Priority and Outcome/Service Priorities

The report helps to achieve the strategic priority "Aiming for excellence – ensuring the Council is efficient in its use of resources, is effective in delivering its plans, is a good employer and communicates effectively with its customers, staff and partners" and the service plan priority to ensure the proper administration of council's financial affairs including reviewing, developing and reporting on the financial aspects of corporate governance.

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Background Documents

Whistleblowing Policy

Report

Background

1. Norwich City Council is committed to the highest standards of openness, probity and accountability in its use of public funds. These updated strategies are intended to promote an anti-fraud culture and to mitigate the risk of fraud and corruption preventing the council from achieving its objectives.
2. The council's *Aiming for excellence* programme aims to ensure that the council is efficient in its use of resources, is effective in delivering its plans, and is a good employer.
3. To help achieve these aims the council has governance arrangements in place which help to ensure that the highest standards of conduct are practised by elected members and employees, together with other individuals and organisations that the council deals with.
4. The governance framework centres on the council's constitution, and includes codes of conduct for members and employees, financial regulations, contract standing orders and the procurement strategy. The framework is supported by the anti-fraud and corruption strategy, the housing and council tax benefit anti-fraud strategy and the whistleblowing policy.
5. It is important that the governance framework is kept up to date and relevant. The anti-fraud strategies have not been updated for a number of years and the purpose of this report is to propose revised strategies which take account of recent developments and best practice.
6. The revised anti-fraud and corruption strategy is shown at Appendix A and the housing and council tax benefit anti-fraud strategy is shown at Appendix B.
7. The whistleblowing policy has also been revised and is the subject of a separate report to today's meeting.
8. The revised strategies have been discussed by the corporate management team on 19 November 2008 and by UNISON at today's Joint Consultative and Negotiating Committee.

Changes introduced by the new anti-fraud and corruption strategy

9. The revised strategy states how the prevention of fraud links in to the council's objectives. There is a clear statement of intent that the council is determined to protect itself against fraud and corruption, both from within the council and from outside. It states that the council is committed to an effective anti-fraud and corruption strategy designed to encourage prevention, promote detection and identify clear procedures for investigation.
10. The revised strategy also gives working definitions for fraud and corruption, and refers to the new offences introduced by the Fraud Act 2006. Reference to money laundering legislation is also included for the first time.

11. The ten general principles of public life from the members' code of conduct are now attached as an appendix.
12. Other than the above, the remainder of the changes relate to the strengthening of the component parts of the strategy under culture, prevention and detection, in particular recruitment, exchange of information with other agencies, and investigation procedures.
13. As with the revised whistleblowing policy, this strategy will in future be a corporate policy rather than an HR policy, and will be included on the council web site.

Changes introduced by the new housing and council tax benefit anti-fraud strategy

14. The revised strategy now includes a statement of intent, and emphasises the duties of elected members, employees, and fraud investigation officers. It also refers to the relevant legislation and strengthens some of the procedural aspects of benefit fraud investigation.

Research carried out in developing these strategies

15. In drafting these updated strategies, recently reviewed strategies of other local authorities were used as best practice.
16. Account has also been taken of guidance from CIPFA and the Audit Commission.

Proposal and Reasons

17. The adoption of updated anti-fraud strategies will assist the council in combating fraud and corruption and other acts of "wrongdoing".
18. The updated strategies are also in line with the stricter requirements of the key lines of enquiry from the 2008/09 use of resources assessment.
19. Continuing to foster and develop an anti fraud and corruption culture at the council is important and can bring real benefits to the council, its staff, its members, the public and those other bodies with whom it interacts.

Conclusion

20. Adoption of the revised anti-fraud strategies will strengthen the council's corporate governance framework and enhance existing arrangements developed to safeguard the council's position against fraud and corruption as defined in the strategies.



ANTI-FRAUD & CORRUPTION STRATEGY

1. Introduction

Norwich City Council is committed to the continual improvement of its services – the *Aiming for excellence* programme aims to ensure that the council is efficient in its use of resources, is effective in delivering its plans, and is a good employer.

The council's governance arrangements contribute to these aims, as well as ensuring the highest standards of openness, probity and accountability in the use of public funds. This anti-fraud and corruption strategy is intended to mitigate the risk of fraud and corruption preventing the council from achieving its objectives.

2. Statement of Intent

Norwich City Council is determined to protect itself against fraud and corruption, both from within the council and from outside. The council is therefore committed to an effective anti-fraud and corruption strategy, which is designed to:

- encourage prevention,
- promote detection, and
- identify clear procedures for investigation.

The council has a framework of procedures and controls that set out best practice and aim to reduce the risk of fraud and corruption. This framework includes:

- Council constitution, including financial regulations and contract standing orders
- Code of governance
- Procurement strategy
- Codes of conduct for members and employees
- Whistleblowing policy
- Register of interest and register of gifts and hospitality
- Housing and council tax benefit anti-fraud strategy

The council expects members and employees at all levels to lead by example in achieving adherence to legal and financial rules, procedures and good practices. The council also expects that individuals and organisations it comes into contact with, such as suppliers, contractors and partners, will act with integrity at all times.

The council's anti-fraud and corruption strategy is based on procedures which are designed to counter any attempted fraudulent or corrupt act. These cover:

- Culture
- Prevention
- Detection and Investigation
- Publicity and Training

In addition, specific arrangements have been put in place to counter housing benefit fraud – these are detailed separately in the Housing and council tax benefit anti-fraud strategy.

3. Definitions of Fraud and Corruption

This strategy adopts the Audit Commission's definitions, which are as follows:

Fraud

"The intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain."

This strategy is also intended to cover all financial irregularities and criminal acts which may affect the authority, including: theft of property; false accounting; obtaining by deception; money laundering; computer abuse and crime.

Corruption

"The offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person."

In addition, this strategy covers *"the failure to disclose an interest in order to gain financial or other pecuniary benefit."*

The Fraud Act 2006

The Fraud Act 2006 established three ways of committing fraud:

- False representation
- Failing to disclose information
- Abuse of position

It also introduced the new offences of:

- Obtaining services dishonestly
- Possessing articles for use in fraud

4. External Scrutiny of the Council's Affairs

The council's affairs are open to scrutiny by a variety of external bodies and people. These include:

- Audit Commission, which is required to ensure that the council has adequate arrangements for the prevention of fraud and corruption
- The public through the complaints procedure and through their right to inspect the council's published accounts, performance indicators and corporate plan
- HM Revenue and Customs
- Department for Work and Pensions
- Local Government Ombudsman
- Standards Board for England

The council welcomes such external scrutiny.

5. Statutory Responsibilities

The head of finance, under Section 151 of the Local Government Act 1972, is required to make arrangements for the proper administration of the council's financial affairs.

The head of legal and democratic services, as monitoring officer under Section 5 of the Local Government and Housing Act 1989, ensures that the actions of members and officers are scrutinised as to their legality.

A money laundering reporting officer (MLRO) has been nominated in accordance with the Money Laundering Regulations 2003. The MLRO will assess reports of potential money laundering received from council employees and if appropriate may make a report to the Serious Organised Crime Agency.

6. Internal Audit

Internal audit acts as an independent assurance function that primarily provides an objective opinion to the council on the control environment comprising risk management, internal control and governance, by evaluating its effectiveness in achieving the council's objectives.

All internal audit activity is subject to approval and review by the audit committee.

In addition to the above, the council participates in the Audit Commission's National Fraud Initiatives. Internal audit plays a key role in ensuring that the exercise is properly co-ordinated and that the necessary actions are taken based on the results.

7. Code of Governance

The council has adopted a code of governance which sets out the principles of good corporate governance in line with best practice. Every year the council assesses its arrangements against the code and reports the results in an annual governance statement, which is published with the statement of accounts.

8. Standards Committee

The council's standards committee plays a key role in promoting and maintaining high standards of conduct by members in accordance with their code of conduct.

9. Culture

9.1 Statement of Intent

Norwich City Council is determined that the culture and tone of the organisation is one of honesty, integrity and opposition to fraud, corruption and money laundering.

In addition to the council formally adopting the seven principles of standards in public life, the council has also adopted the ten general principles governing the conduct of elected members, which relate to the following:

- Selflessness
- Honesty and integrity
- Objectivity
- Accountability
- Openness
- Personal judgement
- Respect for others
- Duty to uphold the law
- Stewardship
- Leadership

The code of conduct for members takes account of the above principles, which are further explained in Appendix 1.

There is an expectation and requirement that all council members and employees will lead by example in these matters, and that all individuals, organisations (for example, contractors, recipients of grants) and partners associated with the council will act with honesty and integrity.

9.2 Concerns of Members and Employees

Elected members and employees of the council are the most important element in its stance against fraud and corruption, and are positively encouraged to raise any concerns they have on these issues. The council has a whistleblowing policy which has been made available to all members and employees and sets out procedures for raising concerns.

The policy also includes detailed guidance for employees and managers on how to react to concerns of inappropriate behaviour.

Members and employees can raise concerns in the knowledge that they will be treated in confidence and properly investigated in accordance with the policy.

9.3 Concerns of the Public and Others Dealing with the Council

Members of the public, contractors, suppliers and partners are encouraged to report concerns through the council's whistleblowing policy or complaints procedure, if appropriate. In addition, details of the benefit fraud and insurance fraud hotlines are available on the council website www.norwich.gov.uk.

9.4 Allegations of Fraud or Corruption

Managers are responsible for following up any allegations of fraud or corruption, and are expected to do so through defined procedures, which are set out within the council's disciplinary rules and section 11.2 (below). Any allegations should be brought to the attention of the head of finance and/or the audit manager in order that lessons can be learned in relation to possible internal control failures.

Managers are expected to deal swiftly and firmly with those who defraud the council or who are corrupt. The council will be robust in dealing with corruption and malpractice.

There is, of course, a need to ensure that any investigation process is not misused, and the raising of unfounded malicious allegations may therefore be dealt with as a disciplinary matter. However, those who raise valid concerns in good faith are assured that they will be taken seriously and will be protected. Victimisation of whistleblowers, or attempts to deter them from raising concerns, is also likely to be dealt with as a disciplinary matter.

9.5 Money Laundering

Any suspicion that money laundering may have taken place should be reported to the solicitor of the council (as money laundering reporting officer), who after consideration of the facts may make a report to the Serious Organised Crime Agency.

10. Prevention

10.1 Employees

A key preventative measure in the fight against fraud and corruption is to make effective checks at the recruitment stage to establish, as far as possible, the propriety and integrity of potential employees. This should include temporary and agency staff as well as permanent employees.

Recruitment should follow the council's recruitment guidelines. Accordingly, managers should ensure that written references are obtained regarding the known honesty and integrity of potential employees, before employment offers are confirmed. Proof of identity, entitlement to work in this country and relevant qualifications should also be confirmed, prior to appointment.

Employees of the council are expected to operate within the council's code of conduct for employees. This sets out minimum standards, which employees should observe. Employees are also expected to adhere to the standards laid down by any professional bodies or institutes to which they may belong.

Employees are also expected to comply with section 117 of the Local Government Act 1972, which requires the disclosure of any financial interests in contracts relating to the council and the refusal of any fees or rewards whatsoever, other than their proper remuneration.

The council has in place a disciplinary procedure that applies to all categories of employees.

10.2 Members

Elected members are required to operate within:

- The council's constitution
- Member's code of conduct
- Sections 94 to 97, and 105 of the Local Government Act 1972
- Local Authorities Members' Interest Regulations 1992 (S.I. 618)
- Any future relevant legislative provisions or codes of conduct

10.3 Internal Control Systems

The council's constitution contains financial regulations and contract rules which cover a wide range of procedures, and require employees to act in a proper manner when dealing with the council's affairs. The rules detail the required practice for a number of common tasks that are financially based, and aim to ensure that a consistent approach to financial matters is taken across the authority.

The head of finance has a statutory duty under section 151 of the Local Government Act 1972 to ensure there are proper arrangements for the administration of the council's financial affairs. This includes having documented procedures and responsibilities of staff in relation to the council's financial activities.

The head of legal and democratic services, as monitoring officer under section 5 of the Local Government and Housing Act 1989, monitors the legality of the council's affairs.

The council has developed, and is committed to maintaining, systems and procedures that incorporate efficient and effective internal controls. These include adequate segregation of duties to minimise the risk of error and impropriety. Directors and senior managers are required to ensure that controls and procedures covering key financial and computerised systems are properly maintained and documented.

The existence, appropriateness, and effectiveness of these internal controls are independently monitored by the council's internal audit function. Annual internal audit plans are drawn up and are regularly reviewed, to ensure comprehensive audit coverage, based on assessments of risk.

The audit committee receives reports on internal audit activity and the audit manager's annual audit opinion in order to come to a view on the overall adequacy and effectiveness of the council's internal controls.

In addition, the council's external auditors give an independent assessment of the adequacy of the council's financial systems, and the adequacy of the council's arrangements for preventing and detecting fraud and corruption.

10.4 Exchange of Information

The council has arrangements in place to encourage the exchange of information with other agencies in relation to national and local counter fraud and corruption activity, in accordance with data protection requirements.

With the ongoing risk of fraud perpetrated against local authorities and benefit agencies, usually involving multiple identities and addresses, the necessity to take steps to combat this has become increasingly important.

The council has liaison arrangements with:

- Norfolk Constabulary
- Norfolk finance officers and chief internal auditors
- Other local authorities
- Department of Work and Pensions
- HM Revenue and Customs
- Audit Commission
- Housing Benefit Matching Service
- National Anti-Fraud Network
- Serious Organised Crime Agency
- The council's insurers

In order to maximise the effectiveness of the exchange of information, all application forms for services provided by Norwich City Council should request sufficient personal identifiers, including forename and middle name, address and postcode, date of birth, and national insurance number.

An appropriate fair processing notice must always be included on all such application forms. The council's data protection officer will advise on the necessary wording of such a notice.

Under the Data Protection Act, all council systems which process personal information must be properly registered with the Information Commissioner's Office. Again, the council's data protection officer can advise on this.

11. Detection and Investigation

11.1 Detection

The council's internal control systems are designed to be a deterrent to fraud and provide indicators of any fraudulent activity. Beyond this, directors and heads of service have a responsibility for managing the risk of fraud and corruption and being aware of any unusual financial transactions which may indicate possible money laundering.

However, it is often the alertness of employees, members and the public that enables detection to occur, and the appropriate action to take place, when there is evidence that fraud, corruption or money laundering may have been committed, or is in progress.

Employees are required by their code of conduct to report any suspicion of corruption or questionable practices, whether by colleagues, service users, contractors, suppliers or partners.

Despite the best efforts of managers and auditors, many frauds are discovered purely by chance or as the result of a "tip-off", and the council has in place arrangements to ensure that such information is properly dealt with.

11.2 Investigation

Relevant managers are responsible for following up any cases of fraud and corruption that are alleged, suspected to exist, or otherwise discovered. They also have a duty to report such cases to the head of finance without delay.

Managers commencing an investigation should consult the HR service to ensure that the allegation is investigated properly and evidence recorded in such a way that any subsequent disciplinary hearing is not compromised.

Investigation of fraud and corruption must be conducted in accordance with the relevant legislation, for example the Police and Criminal Evidence Act 1984 (PACE), the Regulation of Investigatory Powers Act 2000 (RIPA).

Depending on the circumstances, the HR service may refer an allegation to the head of finance to undertake further investigations.

Managers are only authorised to call in the police if the nature of the allegation warrants such referral and after agreement by the chief executive officer or deputy chief executive officer, the head of finance and the head of legal and democratic services.

Any disciplinary action arising from a fraud investigation will adhere to the council's disciplinary procedure, and will be undertaken by the appropriate level of manager, with the involvement of the HR service.

Internal audit must notify the Audit Commission of all frauds in excess of £10,000 and any corruption cases, plus any cases of particular interest or complexity.

12. Publicity and Training

The council recognises that the continuing effectiveness of this strategy and other anti-fraud measures will depend largely on publicity, training and the responsiveness of members and employees.

This strategy, together with the whistleblowing policy, will be made available on the council intranet and website www.norwich.gov.uk. They will also be available to staff via the HR Workforce system, and all employees are required to confirm that they have read and understood their responsibilities under the policies.

From time to time staff may be surveyed to gauge the extent of their awareness and understanding of these and other policies that are intended to promote high standards of integrity.

The council also expects high standards of integrity from other organisations that it deals with, and as such will make current (and potential) contractors and partners aware of their obligations under this strategy and the whistleblowing policy.

The council supports induction and learning and development planning, particularly for employees involved with internal control systems, to ensure that their responsibilities and duties are regularly highlighted and reinforced.

Induction for new employees will refer to the code of conduct, this anti-fraud and corruption strategy and the whistleblowing policy.

13. Responsible Officer

The head of finance has overall responsibility for the maintenance and operation of this policy.

14. Monitoring and Review

This policy will be monitored and regularly reviewed, taking account of any change of legislation or council policy, to ensure it remains relevant and effective.

APPENDIX 1

The Ten General Principles of Public Life

Selflessness – members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

Honesty and integrity – members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly, and should on all occasions avoid the appearance of such behaviour.

Objectivity – members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.

Accountability – members should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.

Openness – members should be as open as possible about their actions and those of their authority, and should be prepared to give reasons for those actions.

Personal judgement – members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.

Respect for others – members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers and its other employees.

Duty to uphold the law – members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.

Stewardship – members should do whatever they are able to do to ensure that their authorities use their resources prudently, and in accordance with the law.

Leadership – members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.



HOUSING AND COUNCIL TAX BENEFIT ANTI-FRAUD STRATEGY

1. Statement of Intent

Norwich City Council is committed to providing housing benefit and council tax benefit (HB & CTB) to its eligible residents promptly and accurately, on receipt of the required information.

In line with the council's anti-poverty strategy, we will do all we can to ensure people receive benefits to which they are entitled.

However, the council is aware that some people attempt to obtain benefit or continue to receive benefit to which they are not entitled. We take a robust anti-fraud stance in order to protect public funds while ensuring those genuinely in need of assistance get the help they are entitled to.

We will use our prosecution policy as a guide when we make decisions on whether to take action against people who have committed fraud.

Benefit fraud can be defined as *"the deliberate misrepresentation of circumstances, or the deliberate failure to notify changes of circumstances with the intent to gain an advantage or cause a loss."*

Corruption can be defined as *"offering, giving, soliciting or accepting an inducement or reward which may influence the action of any person."*

2. Resources

The head of finance will appoint sufficient fraud investigation officers to carry out alleged offences perpetrated against the benefits system.

The head of finance as section 151 officer will appoint fraud investigation officers as inspectors who have the power of entry and inspection under section 110A of the Social Security Administration Act 1992, as amended.

Appointed inspectors will exercise these powers in connection with the administration of claims for HB & CTB.

Any abuse of inspector powers will result in those powers being revoked and possible disciplinary action.

3. Responsibilities of Council Employees

The council is committed to preventing fraudulent abuse by its own employees. All new employees employed in the administration and investigation of benefits will be subject to a rigorous vetting procedure prior to being offered employment.

The council requires all employees to report (on the register of disclosure and interests) details of any property that they are renting to tenants, where HB and/or CTB are involved. All employees are required to disclose any benefit interest they may have.

Interest is defined as a claim for benefit where the employee:

- is the landlord or agent;
- has some other kind of interest in the property
- is the claimant or partner of the claimant
- is otherwise resident in a claimants household
- is a close relative (as defined in benefit regulations) of the claimant

Any interest listed above must be recorded in the council's register of disclosure and interests.

Any council employee found to be involved in a benefit or linked offence either within Norwich City Council, another local authority or the Department for Work and Pensions may face disciplinary action and also may be prosecuted.

All council employees are expected to refer cases to the benefit fraud team for investigation where they have reason to believe benefits have been claimed fraudulently. Employees may be asked to give statements which could be produced in court, but the fraud officer would inform them of this prior to requesting a statement.

4. Duties of Elected members

The council requires all elected members to disclose details of any property that they are renting to tenants, where council benefits are involved.

5. Duties and Considerations of Fraud Investigation Officers

When conducting investigations, fraud officers will work within the guidelines of the Police and Criminal Evidence Act 1984 (code of practice) and the Criminal Procedures and Investigations Act 1996. They will at all times apply appropriate procedures to maintain confidentiality.

Fraud officers will, at all times, be required to comply with the council's code of conduct for employees as well as other codes specific to their activity.

6. Whistleblowing Policy

The council has a whistleblowing policy and it is available to all employees of the council through the intranet and HR Workforce system. In accordance with this policy and codes of conduct, council employees and elected members are expected to inform the council about any suspected malpractice by colleagues, including suspected benefit abuse.

7. Data Protection Requirements

The council will act in accordance with current data protection legislation and any advice issued by the Information Commissioner.

It will use exemptions under the legislation to protect its own employees and those of external organisations who may be asked to supply information to the council during the course of fraud investigations.

8. The Human Rights Act 1998

The council expects all employees dealing with benefit administration to comply with the Human Rights Act, at all times.

9. The Regulation of Investigatory Powers Act 2000

Fraud officers will comply with the requirements of the Regulation of Investigatory Powers Act, in all cases where surveillance is used to investigate fraud.

10. Working in Partnership

The council is keen to work with other agencies to combat benefit fraud including:

- the Department for Work and Pensions
- HM Revenue and Customs
- the Police
- the UK Border Agency
- other local authorities
- any other organisation committed to the prevention and detection of crime

11. Training

The council will ensure its fraud investigation officers are fully trained to deal with investigations in the appropriate manner, ensuring adherence to relevant legislation. This includes support and funding to ensure all fraud officers qualify in the seven foundation courses of Professionalism in Security (PINS) or equivalent, and any other training as necessary.

All benefits employees and other front line staff, who deal with benefit claimants, will receive fraud awareness when they join the council and annual refresher training thereafter. This is to ensure relevant employees are aware of what to look for and to achieve better quality referrals to the fraud team.

Feedback is given to employees when they refer a case to the fraud team, as this generates a positive culture which results in that member of staff being more likely to refer other cases in the future.

12. Publicity

Publicity will be used to:

- encourage take-up of benefit for those in need of assistance
- discourage those who may seek to defraud the system
- advise the public that the council has an investigation team with the sole purpose to investigate suspected benefit offences
- inform the public of cases where claimants are prosecuted to act as a deterrent and show the council's commitment to protecting public funds.

13. Reporting Fraud

The council has and advertises a benefit fraud 'hotline,' which is available twenty four hours a day, seven days a week and all calls are treated in confidence (except where the caller states they are prepared to give statements / evidence in court).

The council has and advertises an online facility which can also be used to report fraud and has a disclaimer to reassure that no personal information will be shown on the referral.

Members of the public can also call in to City Hall (during office hours) to report fraud or write in to the council.

Fraud officers treat all information confidentially and will as a minimum carry out background checks to see if there is anything that may need further investigation.

14. Data Matching

The council matches data with various government and non-government agencies to identify irregularities and some of these will result in a fraud investigation. Data is matched via the Department for Work and Pensions and Housing Benefit Matching Service (HBMS), via the Audit Commission's National Fraud Initiative (NFI), and by cross-matching internal benefit, council tax and housing data.

At all times the council will act in accordance with data protection legislation and, where appropriate, in consultation with recognised trade unions.

15. Verification of HB & CTB claims

To ensure a claim is legitimate on application, the council carries out stringent verification checks in line with the Department for Work and Pensions Verification Framework.

Any documents sent in support of a claim will be verified and the document scanned on to our IT systems and may be used for cross-matching at a later date.

Designated employees will also use the Department for Work and Pensions Customer Information System to validate information on benefits paid by Jobcentre Plus, the Pension Service and HM Revenue and Customs.

The benefit claim form is designed to obtain all relevant information to enable a benefits officer to process a claim. If sections are left blank a benefits officer will return this and ask for the relevant sections to be completed.

If a person needs assistance due to English not being their first language or they have hearing problems the council uses the INTRAN service to assist in the obtaining of information.

16. Mail Re-direction

All benefit post is sent out using 'do not re-direct' envelopes to ensure that if there is a doubt over residency, this can be dealt with at the earliest opportunity.

17. Reporting Fraud / Abuse - Contact Details

If an employee, elected member or member of the public has reason to believe that a staff member is committing an offence, call the following numbers:

- for benefit fraud call the council fraud hotline on 01603 212700, or the national benefit fraud hotline on 0800 328 6340.
- for other abuse against the council refer to the council's whistleblowing policy or complaints procedure.

18. Overpayments

The overpayments team is part of the benefit service. When an overpayment occurs the team sets the recovery rate at £9.15 per week, in line with legislation. In proven fraud cases (where a sanction is accepted or a person is found guilty in court) the overpayment recovery rate can be increased to £12 per week. On receipt of a statement of means the fraud recovery rate can be amended with the agreement of the fraud team leader or benefits manager.

19. IT Equipment and Security

All IT used by the authority is owned by an external IT supplier and there are various policies (accessible through the intranet and HR Workforce system) which govern the use, accessibility and security of the equipment.

20. Responsible Officer

The head of finance has overall responsibility for the maintenance and operation of this policy.

21. Monitoring and Review

This policy will be monitored and regularly reviewed, taking account of any change of legislation or council policy, to ensure it remains relevant and effective.