

Annex B

STRATEGIC FRAUD RISK REGISTER



Likelihood	A Almost Certain				
	B Probable				
	C Possible	7	14,15,17,18,19		13
	D Hardly Ever	11	1,2,3,4,5,6,8,9,10,11,12,16,21,22,24	23,25	
		4 Negligible	3 Minor	2 Major	1 Critical
	Impact				

RISK REGISTER: FRAUD RISKS – AS AT DECEMBER 2018

**December 2018
VERSION: 2**

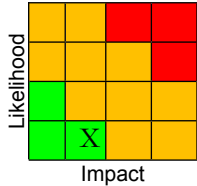
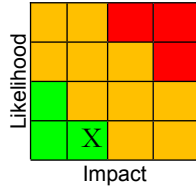
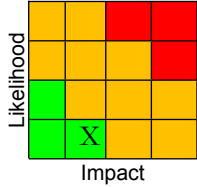
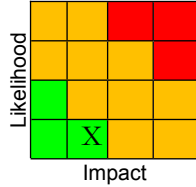
**REVIEWED:
CMT
Risk owners**

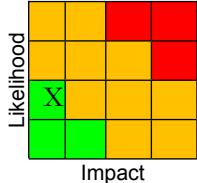
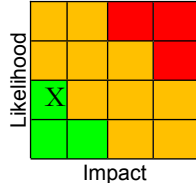
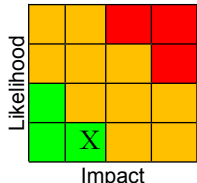
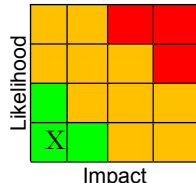
OWNER: CHIEF FINANCE OFFICER/CORPORATE MANAGEMENT TEAM

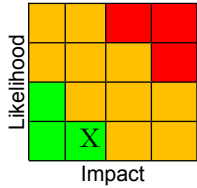
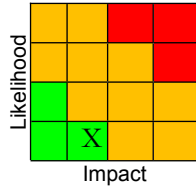
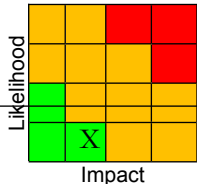
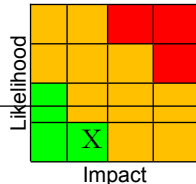
National and local fraud comparison - uses CIPFA fraud survey 2017

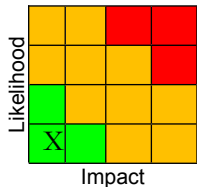
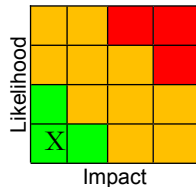
Risk No:	Risk Description (and CoIC exposure)	Risk Owner	Risk Appetite (Corporate)	Controls/Actions		Current Risk Score	Target Risk Score at end of March 2019	Level of Mgmt Assurance - (Full, Substantial, Limited, No)	Assurance – Direction of Travel (Improving, Static, Declining)
				Current/Already in Place	Required Mitigation (inc timescales)				
1.	<p>Contracting /contract management</p> <p>National – Low Local – no issues</p> <p>Bribes and kickbacks - corruption abuse of position Inflated performance information Failure to deliver contract / standard Altered payment details / mandate fraud False / duplicate payments / double invoicing / overpayments Cartels Collusion with suppliers / contractors Conflict of interest Delivery of inferior or substandard substitute products</p>	City Solicitor	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Fraud training	None			Substantial	Static
2.	<p>Procurement</p> <p>National – Low Local – no issues</p> <p>Violation of procedures Bribery of officers involved in tendering. Cartels Manipulation of accounts Records or methods of payments. Failure to supply Failure to supply to contractual standard. Bid rigging False bid information</p>	City Solicitor	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Tendering process Transparency Code E-procurement Credit checks	None			Substantial	

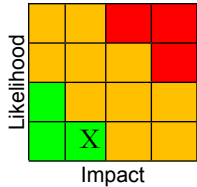
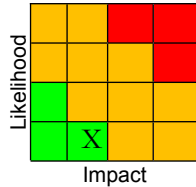
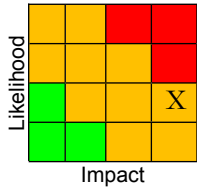
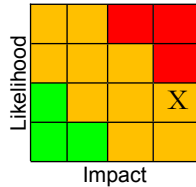
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3	<p>Payments – Creditors</p> <p>National – Low Local – <i>there are some duplicate payments but very low numbers paid incorrectly</i></p> <p>Credit card/ procurement card False invoices/claims Duplicate payments - false submission BACS fraud - fraudulent change of bank details. Mandate fraud. Finance lease fraud Illegitimate purchases</p>	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes P-card controls Purchase order control Bank details checks Reconciliations System controls	To agree the level/type of additional creditor duplicate payment checks needed (CFO) (if any over and above NFI) (CFO Mar 19) Purchase order project CFO/CX (ongoing) <ul style="list-style-type: none"> • Link P2 to Agresso • Contracts Register/module • Educational drive 	<p>Likelihood</p> <p>Impact</p>	<p>Likelihood</p> <p>Impact</p>	Substantial	
4	<p>Income Collection</p> <p>National – Low Local – <i>Occasionally. EG Car park income - theft of machine money (not staff) - Periodic fraud at other LA's - usually around lack of supervision, procedures, receipting, reconciliation, signage. Policy of ""cash free"" environment – but some very limited cash still received.</i></p> <p><i>Ticket forgery possible - theft of services</i></p> <p>Theft by employee / external individuals</p>	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes Parking services controls PCIDSS IT security Bank reconciliation Receipting systems No-cash policy	None	<p>Likelihood</p> <p>Impact</p>	<p>Likelihood</p> <p>Impact</p>	Substantial	

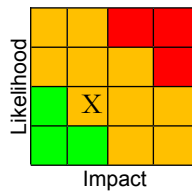
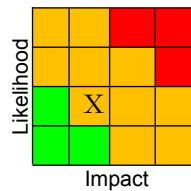
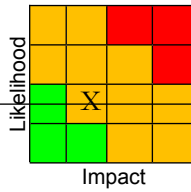
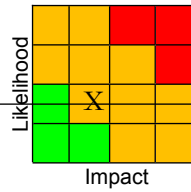
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				Current/Already in Place	Required Mitigation (inc timescales)				
	Abuse of customer payment card data Cash received borrowed Non recording of income Falsification of income records Theft of cash / income / accounting fraud - some significant areas such as parking income Avoidance of charges								
5	Debt management National – Low Local – no issues Falsifying refunds Manipulation of credit balances/payments Improper write off / cancellation Failure to institute recovery proceedings Switching/transferring arrears or manipulation of credit balances Suppression of any notification of debt to be raised	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes Refund procedure Balance transfer procedure Write off/recovery procedure/authorisation On hold procedure/review Reporting performance	None			Substantial	
6	Money Laundering National – Low Local – no issues Hiding improper transactions Exchanging money or assets	City Solicitor	Cautious	Staff training and awareness Policies and procedures Income controls Monitoring processes Segregation of duties Cash payment limits Financial regulations Whistleblowing policy	Money Laundering policy to be updated December 2018 City Solicitor/Audit Manager)			Substantial	

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	obtained criminally for 'clean' money or assets Refunds following cash overpayments			Counter fraud policy					
7	BACS/Cheques National – Low Local – no issues False instruments Theft of customer card data Mis-use / alteration of cheques Mandate, Direct Debit or Standing Order fraud on Council's account. Counterfeit cheques Alteration of existing cheques	CFO Sarah Hardy	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes Bank reconciliation PCIDSS compliant Cheque control Other reconciliation arrangements	None			Substantial	
8	Payroll/employees National – Low Local – Occasional Ghost employees Manipulation of payroll data Recruitment fraud e.g. qualification / reference/ convictions False claims and allowances False recording of working hours and leave Pension fraud Abuse of holiday, sickness absence or other time off entitlements Working whilst on sick leave Failure to declare convictions	City Solicitor	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls Recruitment controls/ID checks IT systems	None			Substantial	

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	Mis-use of time - excessive use of mail / internet Unauthorised changes to payroll system Redirection or manipulation of payments Not undertaking required duties Working for multiple employers without knowledge of others breaches of authorisation and payment procedure false identity immigration - no right to work acceptance of gifts/ conflicts of interest								
9	Treasury management / investment fraud National – Low Local – no issues Misappropriation / manipulation of investments for personal gain Potential conflicts of interest Unauthorised access to information Fraudulent misappropriation of assets Loss through breach of procedures False Instruments	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls Treasury advisors Treasury strategy and guidance	None			Substantial	
10	Property, land , equipment National – Low Local – no issues	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR	Completion of inventory (Mar 19)			Substantial	

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				Current/Already in Place	Required Mitigation (inc timescales)				
	<p>Misappropriation / misuse Valuation of property for personal gain Disposal of assets - land and property</p> <p>Mark wheater</p>			<p>Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p> <p>Inventory Asset registers Acquisition and disposal procedures RICS Legal review</p>					
11	<p>Grants - Housing and Economic Support / Third Sector</p> <p>National – Low Local – no issues</p> <p>This type of fraud relates to the false application or payment of grants or financial support to any person and any type of agency or organisation</p> <p>Fictitious / fraudulent claims "False payment of grants, loans or financial support to any private individual, company, charity or non-governmental organisation, including; - housing renovation / DFG grant - collusion between housebuilder and builder</p>	<p>CFO City Solicitor AD-HES</p> <p>Hannah Cann</p>	Cautious	<p>Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p> <p>Grant control procedures Quotes/tenders Service level agreements</p>	None			Substantial	

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	- grants paid to landlords for property regeneration" donations to local sports clubs and other clubs loans or grants made to a charity Misuse of monies / failing to deliver agreed service Theft / misappropriation of grant funds Conflicts of interest								
12	False Accounting National – Low Local – no issues Making misleading / false or deceptive entries Omission of details	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls Internal control processes External audit Reconciliations IT systems	None			Substantial	
13	IT/Data National – Medium Local – External malware attacks possible / very occasional issues with employees accessing data Misuse/ theft of information for personal gain Manipulation of data – financial or non-financial –	AD-SD City Solicitor BDIT Manager Data Protection Officer	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control	None Implementation of (IT security) audit recommendations LGA Stocktake (actions to be agreed) IT DR review completion Completion of GDPR action			Limited/ Substantial	

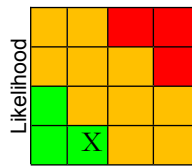
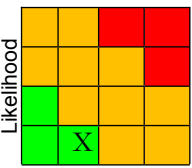
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	performance or gain Data theft e.g. access rights Cyber fraud/malware/ransomware/hacking Theft of equipment Misuse of internet and email			Authorisation processes IT access controls IT security policies Information governance policies and action plans PCIDSS Prevention Cryptshare Citrix controls Software controls Patching Back-up/IT DR Asset registers Procurement process Disposal process	plans				
14	Insurance National – Low Local – no issues This fraud includes any false insurance claim made against an organisation or an organisation's insurers. <i>Some housing "disrepair" companies operating – able to defend any PL claims</i>	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls Claims management systems Database of previous cases	None			Substantial	
15	Council Tax National – High Local – 2015-16 CoIC SPD - 322 removals savings £85K	CFO HRBSS Bob	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR	Single Person Discount review 2018 (complete) Reviewing rolling SPD reviews and SMART			Substantial	

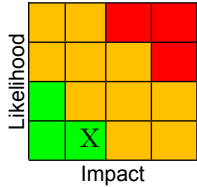
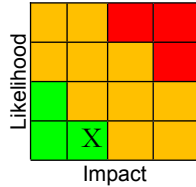
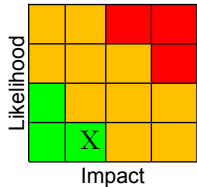
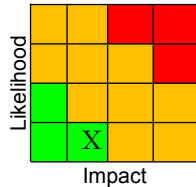
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	<p>2018 722 removals 6.8% Revenue £218,724</p> <p>There are some concerns about Landlords manipulating the system to avoid CTax on Student accommodation. Only 4/5 incidents uncovered.</p> <p>Only 1 attempt has been made to fraudulently obtain a refund of Tax, not successful and reported to Police and Bank</p> <p>A. Single Person Discount A. Exemptions - student occupancy/ vacant properties / property left empty by deceased persons / severely mentally impaired B. Avoidance of liability through any other fraudulent claim for council tax entitlement e.g. student exceptions B. New properties not on the list built without planning permission B. No notification of properties built & occupied or built & substantially complete. C. Refund fraud</p>	Wagstaff		<p>Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p> <p>SPD review Exemptions/discounts ongoing review processes Property inspection Refund controls Benefit record matches</p>	referrals with LCFP – could take place from April 2019.				
16	<p>Business Rates</p> <p>National – low risk Local –BR avoidance project now completed</p> <p>One or two are referred to the</p>	CFO HRBSS	Cautious	<p>Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing</p>	None			Substantial	

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	<p><i>Insolvency service each year</i></p> <p><i>Non-disclosure - there are about 10 a year where we have issues and need to investigate further/challenge</i></p> <p>Business rate fraud is not a transparent landscape for the fraud investigator, with legislation making it difficult to differentiate between evasion and avoidance. Business rate fraud can include the falsification of circumstances to gain exemptions and discounts.</p> <p>This is any fraud linked to the avoidance of paying NNDR which could include: False company details Failure to declare occupation Payment using false bank details Companies going into liquidation then forming new companies Not disclosing relevant information - e.g. size of company to gain rate relief (small business relief) Manipulation of credit balances/payments Fraudulent refunds <i>The use of temporary leases to charities to avoid empty rate relief charges is prevalent. Unfortunately this is a difficult one to avoid due to legislation</i></p> <p><i>Partial occupation for 6 weeks is also prevalent – again this is a loophole in the law and whilst not in the spirit of the</i></p>			<p>Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p> <p>Company checks Insolvency service Business rates avoidance work – ongoing learning used Intelligence gathering Reliefs – approval Balance transfer approval Refund process</p>					

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	<p><i>law there is case law which says that this is not illegal.</i></p> <p>Avoidance tactics are “high risk” but within legislation so not technically fraud</p>								
17	<p>Council Tax Support Scheme</p> <p>National – High Risk Local –</p> <p><i>Changes are made to CTS accounts linked to any HB fraud data</i></p> <p>Any fraud linked to the false claiming of Council Tax Support.</p>	CFO HRBSS	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls	Reviewing rolling SPD reviews and SMART referrals with LCFP – could take place from April 2019.			Substantial	
18	<p>Housing Benefit</p> <p>National –High Risk Local – no issues</p> <p><i>(Sept 17) So far in 2017/18 the</i></p>	CFO HRBSS	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training				Substantial	

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	<p>Council was involved with 82 benefit referrals to and from SFIS linked to possible benefit fraud. CoIC officers are still responsible for agreeing administrative penalties.</p> <p>For 2017/18 5 Housing Benefit administrative penalties were issued by City of Lincoln Council. These had a value of £4463.08. Overpayments in these cases totalled £9053.97. Four cases were prosecuted and found guilty. Overpayments in these cases totalled £16,967.25. In total CTS values where these linked to HB cases were a reduction of £2329.58. Total overpayments are therefore £28,350.80</p> <p>Any fraud linked to the false claiming of housing benefit</p> <p>No recourse to public funds - this type of fraud includes claimants using false documents to obtain benefits</p>			<p>NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p> <p>Fraud Policies and Procedures DWP/SFIS liaison Validation exercises HB Matching Scheme NFI matching scheme RTO/Optional RTI – RTI continues 18-19 Fraud policy Fraud Act Intelligence gathering Data cleansing HB/CTS fraud prosecution and sanctions policy updated (18/19)</p>					
19	<p>Housing</p> <p>National – High Risk Local – Dec 17, 17-18 2 cases sub-letting 11 notices to quit for non-occupation</p> <p>Applications: False information is received, but the risk impact is low as checks made would normally capture such as fraud</p> <p>Have had some cases where we have referred potential client (financial) abuse to the</p>	AD-Housing (management/Investment)	Cautious	<p>Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls</p>	<p>Undertake a tenancy fraud risk assessment and produce an updated fraud strategy/action plan, aligned to a refresh of the fraud policy.</p> <p>Undertake some pro-active fraud work during 2018/19 (using a tenant verification service) making resources available as part of the new budget process.</p> <p>Agreed that a process of ID verification needs to be</p>			Limited/Substantial	

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	<p><i>Police</i></p> <p><i>Housing and tenancy fraud takes a number of forms including:</i> <i>illegal subletting for profit</i> <i>providing false information to gain a tenancy</i> <i>wrongful tenancy assignment and succession</i> <i>failing to use the property as the principal home</i> <i>right to buy fraud, for example where circumstances have been misrepresented to qualify for a discount</i></p> <p>Tenancy sub-letting in contravention of tenancy agreement (A) Non-occupation in contravention of tenancy agreement (not technically fraud)" Key selling (A) Fraudulent succession - false information (A) Right to Buy fraudulent application , valuation (A) Fraudulent application - false information (B) False homelessness applications - false information (B) Sheltered schemes - theft of customers money (C)</p>			Fraud policy Application process Social Housing Fraud Act Eviction powers ID checks Valuation process (RTB) RTB verification process Home visits No involvement with client monies Access/Key security	undertaken at the 3 week visit. When a tenant registers with the Council a copy of photo ID should be taken" (between December 18 and March 2019)				
20	Development management / Planning National – Low Local – no issues Corruption / collusion / inducements / conflict of	Planning Manager	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training (annual for members) NFI	None			Substantial	

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	interest / bribery Planning, S106, affordability, other areas where officers are checking compliance / fines issued Using Planning process to increase land values False representations (Support/non-support) Provision of false information by the applicant.			Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes Legal requirements Public records Transparency Planning Ombudsman					
21	Theft / Asset misuse National – Low Local – no issues Stores Materials Plant Vehicles Fuel General Theft of cash Theft of income Accounting fraud - significant areas such as Parking income. Inappropriate use of Council assets - eg IT equipment, vehicles, other assets	CFO + All AD's	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes Asset register Inventory Policies/procedures See income risk	Completion of inventory (Mar 19) IT asset check (Mar 19)			Substantial	
22	Refund fraud National – Low Local – "Linked to Council Tax, NNDR, Rents One case 2015/16" <i>We have tightened the</i>	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements	None			Substantial	

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				Current/Already in Place	Required Mitigation (inc timescales)				
	<p><i>controls considerably and put strategies in place so that we are much less likely to be exposed to this kind of fraud.</i></p> <p>Any fraud linked to the false claiming of Council Tax Support, NNDR or Rents refunds. Payment using false/fraudulent instrument then reclaiming a refund. Employee based false payment then request for refund.</p>			<p>Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes</p> <p>Application process PCIDSS Due diligence checks Banking checks Segregation of duties IT access</p>					
23	<p>Election Fraud</p> <p>National –low Local – no issues</p> <p>Fraudulent voting Fraudulent acts by canvassers Fraudulent acts by poll clerks/officers Fraudulent acts by individuals</p>	City Solicitor	Cautious	<p>Management review of processes Staff training Clear policies and procedures Restricted system access Independent count staff Security at the count centre Management oversight Ballot boxes are secure Audit trail Verification of signatures and dates of birth of postal voters Verification of identify at the polling station Supervision at counts Access controls Application form checks Regular review of electoral register Police single point of contact (SPOC) information both ways Integrity plan ahead of any election</p>	None	<p>Likelihood</p> <p>Impact</p>	<p>Likelihood</p> <p>Impact</p>	Substantial	

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				Current/Already in Place	Required Mitigation (inc timescales)				
				Daily checks are completed to ensure that there are no duplicate entries in the register. Controls around impersonation					
24	Bribery and Corruption National – Low Local – no issues Bribery / Corruption / collusion / inducements / conflict of interest	City Solicitor CFO	Cautious	Anti-bribery policy Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing	None			Substantial	
25	Partnerships and outside bodies Fraud risks within these areas	City Solicitor	Cautious	Partnership/joint working guidance Training Member induction/training Legal review Finance review	Further training for officers and members that represent the council on outside bodies, particularly where there is a financial role			Substantial	
26	Identity fraud Identity fraud is a risk within other areas, but is cross-cutting so recorded as a separate risk	City Solicitor CFO	Cautious	Identity checks Guidance/Training DWP requirements Equipment (UV)	Consolidate guidance and distribute corporately by Mar 19			Substantial	

