

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

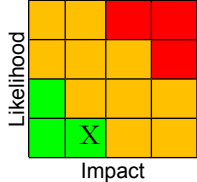
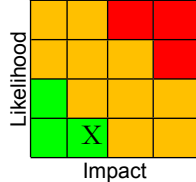
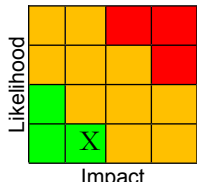
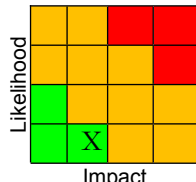
OWNER: CHIEF FINANCE OFFICER/CORPORATE MANAGEMENT TEAM

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	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
3	<p>Payments – Creditors</p> <p>National – Low Local –no fraud</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 			Substantial	Static
4	<p>Income Collection</p> <p>National – Low Local – EG Car park income - theft of machine money (not staff) -</p> <p><i>Risk usually around lack of supervision, procedures, receipting, reconciliation, signage. Policy of ""cash free"" environmen</i></p> <p>Theft by employee / external individuals Abuse of customer payment card data Cash received borrowed Non recording of income</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			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	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	Static
6	Money Laundering National – Low Local – no issues Hiding improper transactions Exchanging money or assets obtained criminally for 'clean' money or assets Refunds following cash overpayments	City Solicitor	Cautious	Staff training and awareness Policies and procedures Income controls Monitoring processes Segregation of duties Cash payment limits Financial regulations Whistleblowing policy Counter fraud policy	Money Laundering policy to be updated December 2018 City Solicitor/Audit Manager)			Substantial	Static

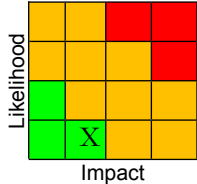
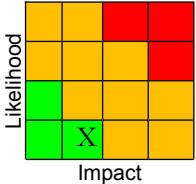
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				Current/Already in Place	Required Mitigation (inc timescales)				
7	<p>BACS/Cheques</p> <p>National – Low Local – no issues</p> <p>False instruments Theft of customer card data Mis-use / alteration of cheques Mandate, Direct Debit or Standing Order fraud on Council's account. Counterfeit cheques Alteration of existing cheques</p>	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 Bank reconciliation PCIDSS compliant Cheque control Other reconciliation arrangements	None			Substantial	Static
8	<p>Payroll/employees</p> <p>National – Low Local –very occasional</p> <p>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 Mis-use of time - excessive use of mail / internet Unauthorised changes to payroll system</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 Budgetary control Authorisation processes IT access controls Recruitment controls/ID checks IT systems	None			Substantial	Static

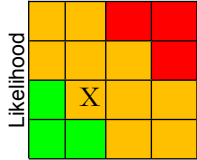
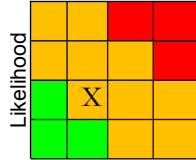
Risk No:	Risk Description (and CoIC exposure)	Risk Owner	Risk Appetite (Corporate)	Controls/Actions		Current Risk Score	Target Risk Score at end of March 2019	Level of Mgmt Assurance - (Full, Substantial, Limited, No)	Assurance – Direction of Travel (Improving, Static, Declining)
				Current/Already in Place	Required Mitigation (inc timescales)				
	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	Static
10	Property, land , equipment National – Low Local – no issues Misappropriation / misuse Valuation of property for	CFO	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring	Completion of inventory (Mar 19)			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	personal gain Disposal of assets - land and property			Due diligence checks Intelligence sharing Budgetary control Authorisation processes IT access controls Inventory Asset registers Acquisition and disposal procedures RICS Legal review					
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 - grants paid to landlords for property regeneration" donations to local sports clubs and other clubs loans or grants made to a</p>	CFO City Solicitor AD-HES	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	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	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	Static
13	IT/Data National – Medium Local – External malware attacks possible Misuse/ theft of information for personal gain Manipulation of data – financial or non-financial – performance or gain Data theft e.g. access rights Cyber fraud/malware/ransomware/hacking Theft of equipment Misuse of internet and email	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 Authorisation processes IT access controls IT security policies Information governance	None Implementation of (IT security) audit recommendations LGA Stocktake (actions to be agreed) IT DR review completion Completion of GDPR action plans			Limited/ Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
				policies and action plans PCIDSS Prevention Cryptshare Citrix controls Software controls Patching Back-up/IT DR Asset registers Procurement process Disposal process					
14	Insurance National – Low Local – no issues This fraud includes any false insurance claim made against an organisation or an organisation’s insurers.	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	Static
15	Council Tax National – High Local – 2018 722 removals 6.8% Revenue £218,724	CFO HRBSS	Cautious	Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training NFI Whistleblowing Arrangements Monitoring	Single Person Discount review 2018 (complete) Reviewing rolling SPD reviews and SMART referrals with LCFP – could take place from April 2019.			Substantial	Static

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				Current/Already in Place	Required Mitigation (in timescales)				
	<p><i>Refund of Tax attempts</i></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>			<p>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>					
16	<p>Business Rates</p> <p>National – low risk Local –BR avoidance project now completed <i>One or two referred to the Insolvency service each year</i> <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>	CFO HRBSS	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>Company checks Insolvency service Business rates avoidance work – ongoing learning used Intelligence gathering Reliefs – approval Balance transfer approval</p>	None			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	<p>This is any fraud linked to the avoidance of paying NNDR which could include:</p> <ul style="list-style-type: none"> 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 Temporary leases to charities Partial occupation - not illegal. 			Refund process					
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	<p>Supervision</p> <p>Separation of duties</p> <p>HR policies</p> <p>Registers (GH/Interests)</p> <p>FPR/CPR</p> <p>Training</p> <p>NFI</p> <p>Whistleblowing</p> <p>Arrangements</p> <p>Monitoring</p> <p>Due diligence checks</p> <p>Intelligence sharing</p> <p>Budgetary control</p> <p>Authorisation processes</p> <p>IT access controls</p> <p>HB changes actioned</p> <p>CTS policy</p> <p>HB matching service</p> <p>RTI</p> <p>SPD reviews (with CTS)</p> <p>HB/CTS fraud prosecution and sanctions policy updated (18/19)</p>	<p>Reviewing rolling SPD reviews and SMART referrals with LCFP – could take place from April 2019.</p>			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
18	<p>Housing Benefit</p> <p>National –High Risk Local – no issues</p> <p><i>2017/18 Five HB admin penalties</i> <i>Four cases were prosecuted and found guilty.</i></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>	CFO HRBSS	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>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>				Substantial	Static
19	<p>Housing</p> <p>National – High Risk Local –17-18 <i>2 cases sub-letting</i> <i>24 notices to quit for non-occupation</i></p> <p><i>Housing and tenancy fraud takes a number of forms including: illegal subletting for profit providing false information to gain a tenancy</i></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</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 pro-active fraud work during 2018/19 (using a tenant verification service)</p>			Limited/Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	<p>wrongful tenancy assignment and succession failing to use the property as the principal home right to buy fraud, for example where circumstances have been misrepresented to qualify for a discount</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>			<p>IT access controls</p> <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</p>	(between December 18 and March 2019)				
20	<p>Development management / Planning</p> <p>National – Low Local – no issues</p> <p>Corruption / collusion / inducements / conflict of interest / bribery Planning, S106, affordability, other areas where officers are checking compliance / fines issued Using Planning process to increase land values False representations</p>	Planning Manager	Cautious	<p>Supervision Separation of duties HR policies Registers (GH/Interests) FPR/CPR Training (annual for members) NFI Whistleblowing Arrangements Monitoring Due diligence checks Intelligence sharing Budgetary control Authorisation processes</p>	None			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	(Support/non-support) Provision of false information by the applicant.			Legal requirements Public records Transparency Planning Ombudsman					
21	<p>Theft / Asset misuse</p> <p>National – Low Local – no issues</p> <p>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</p>	CFO + All AD's	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</p> <p>Asset register Inventory Policies/procedures See income risk</p>	<p>Completion of inventory (Mar 19)</p> <p>IT asset check (Mar 19)</p>			Substantial	Static
22	<p>Refund fraud</p> <p>National – Low Local –None recently</p> <p><i>We have tightened the 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</p>	CFO	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</p> <p>Application process PCIDSS</p>	None			Substantial	Static

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				Current/Already in Place	Required Mitigation (inc timescales)				
	false/fraudulent instrument then reclaiming a refund. Employee based false payment then request for refund.			Due diligence checks Banking checks Segregation of duties IT access					
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> <p>Daily checks are completed to ensure that there are no duplicate entries in the register. Controls around impersonation</p>	None			Substantial	Static

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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	Static
25	Partnerships and outside bodies Fraud risks within these areas including financial	City Solicitor	Cautious	Partnership/joint working guidance Training Member induction/training Legal review Finance review	Further training for officers and members			Substantial	Static
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	Static