

## Appendix B: Proposed Counter Fraud Plan 2021/22

Ref	Risk Area	Activity	Description
CF01-2022	Payroll Pension Blue Badge Concessionary fares Trade Creditors	Progression of NFI Data Matches	Coordinate the Council's and its LATCO's participation in the National Fraud Initiative.
CF02-2022	Corporate risk of Fraud	Policy and Strategy Review	Review each policy annually ahead of the July G&A Committee and ensure that this is presented to CMT and once agreed to be communicated across KCC management via Kmail for managers. Expected policies to be reviewed: Anti-Fraud and Corruption Strategy Anti Bribery Policy Anti Money Laundering Policy Financial Regulations To review key procedures that align with policies. To address any areas of development following the Counter Fraud Review against the FFCL Checklist.
CF03-2022	Corporate Fraud	Kent Intelligence Network	Actively participate in the Kent Intelligence Network and develop data matching proposals to increase detection of fraud at KCC and across Kent authorities.
CF04-2022	All risk areas to support the prevention and detection of fraud and corruption	Relationship Management Strategy for Senior Stakeholders - Including Fraud, Bribery and Risk Assessments.	To ensure that key Senior Stakeholders are kept up to date on the fraud risks and mitigation: Leader as Portfolio Holder CMT (In particular, HoPS, Sect 151 and Monitoring Officer) Corporate Directors Governance and Audit Committee Directorate/ Divisional Directors to progress Fraud, Bribery and Corruption Risk Assessments  Counter Fraud Report to be provided to Leader, CMT prior to be issued to G&A  Counter Fraud Networking meetings within Kent and nationally.
CF05-2022	All fraud risk areas faced by schools to support the prevention and detection of fraud	Proactive Fraud Exercise - Schools	Provide Fraud awareness sessions to school finance staff, emerging leaders and governors. Including existing and emerging risks.
CF06-2022	Blue Badge fraud risk	Proactive Fraud Exercise - Blue Badges	Provide regular attendance at the parking managers meetings to inform them of latest guidance, what's working well what needs improving Provide enforcement awareness sessions to district CEOs. Conduct a Blue Badge amnesty with district Councils
CF07-2022	Social Care fraud risks	Proactive Fraud Exercise - Social Care	Maintain the Financial Abuse tool Kit to support Social Care in identifying and managing financial abuse.

CF08-2022	Procurement fraud risks	Proactive Fraud Exercise - Commissioning	Work with Commissioning in enhancing the commissioning standards to ensure fraud risks are identified and mitigated against.
CF09-2022	Payment/ procurement fraud risks	Data analytics development - payments	To identify a way to use data analytics to help identify fraud and error within the payments systems.
CF10-2022	Procurement fraud risks	Data analytics development - procurement card usage	To identify a way to use data analytics to help identify fraud and error within the procurement card system.
CF11-2022	Counter Fraud Profession	Professional standards	Engagement with the Cabinet Office on the Counter Fraud Profession.
CF12-2022	Tax evasion	Support the development and introduction of a tax evasion strategy and risk assessment	Working with the Chief Accountant and project lead to provide project support in the assessment of tax evasion risks and the mitigating controls and actions.
CF13-2022	Payment fraud risks	Supporting Audit on specific audits where there is a fraud risk	Provide advice and support on key fraud controls in specific audits, support in testing and reporting as required.
CF14-2022	All fraud risk areas	Reactive Investigations	To manage and complete referrals/ investigations.