

Detailed Action Plan for the Achievement of DWP Performance Standards through Implementation of the BFI Recommendations

Re co	Action required	Target date	Responsible Officer	Comment
1 a	Provide written guidance for staff using the risk-based matrix to sift fraud referrals	Implemented	Chief Auditor	We have revised our risk assessment procedures with input from BFI's Performance Development Team. A new scoring matrix has been developed and is now in use. The matrix is being tested and monitored by the Investigations Manager to ensure that it is fit for purpose and driving the desired level of consistency and quality. Guidance has been developed by the Investigations Manager.
1 b	Amend the score required to instigate an investigation to assist in workflow planning	Implemented	Chief Auditor	The matrix score can be adjusted to reflect any changes in workflow and adapted to meet changes to the capacity of the fraud unit such as recruitment of additional investigators.
1 c	Analyse outcomes of successful investigations	Implemented	Chief Auditor	Fraud manager analyses successful investigations monthly and reports on them as appropriate
1 d	Review the scoring matrix so that the most successful types of cases are accepted for investigation	Implemented	Chief Auditor	
1 e	Prioritise benefit investigations according to their score	Implemented	Chief Auditor	The revised risk assessment procedure prioritises investigations according to their score. Currently only high priority investigations are being carried out.
1 f	Analyse referrals to identify trends, build intelligence and support proactive initiatives	Implemented	Chief Auditor	In the process of changing FMS to accurately record fraud types and methods which will enable frauds to be analysed. Separate intelligence lists are being maintained.
1 g	Automatically accept referrals from good quality sources	Implemented	Chief Auditor	The risk scoring matrix and analysis of referrals will be used to ensure that good quality sources are identified and automatically accepted for investigation.
2 a	Give priority to benefit investigations and minimise delays in the investigation process	Implemented	Chief Auditor	We have reviewed the procedure for referring HBMS cases, and these will be formalised into procedural guidance for Benefits and Investigations staff. Formal monitoring is now being undertaken by the Investigations Manager. To support this monitoring process, a spreadsheet has been set up as an interim measure pending review of the computer system. The spreadsheet measures time taken from the receipt of a referral to the sift and from the sift to the first investigative action. The target for both stages of the process is now being met and HBMS referrals are being passed for investigation promptly. This performance will be monitored and data provided for discussion at monthly meetings with the Investigations Manager.
2 b	Sift referrals within an average of 10 days	Implemented	Chief Auditor	
2 c	Take first action within an average of 10 days	Implemented	Chief Auditor	
2 d	Check Housing Benefit Matching Service referrals promptly.	Implemented	Chief Auditor	
3	Develop the Investigation Officers' guidance manual to include how to investigate different types of fraud.	Implemented	Chief Auditor	We are now applying the procedures that are contained in the Department's Fraud Procedures Instructions manual, available through NAFN.

Detailed Action Plan for the Achievement of DWP Performance Standards through Implementation of the BFI Recommendations

Re co	Action required	Target date	Responsible Officer	Comment
4 a	Comply with the Criminal Procedure and Investigations Act 1996 and the Police and Criminal Evidence Act 1984 Codes of Practice	Implemented	Chief Auditor	The Borough Solicitor has issued guidance for investigating officers on when to conduct formal interviews under caution. The Investigations Manager is now checking files on closure, and there is liaison with Borough Solicitor when considering cases appropriate for sanctions. A formal checklist will be developed with the Investigations Manager. The checklist will be expanded to include checks on open investigations. The interim Investigations Manager has carried out management checks on QB50 notebook completion. This check will be embodied in the new checking regime.
4 b	Follow the Department's guidance relating to file maintenance, notebook completion and checking for previous convictions before considering sanctions.	Implemented	Chief Auditor	
5 a	Introduce a comprehensive and systematic management checking and reporting regime to:	Implemented	Chief Auditor	The complete checking regime has been implemented
5 b	Monitor the progress of investigations	Implemented	Chief Auditor	
5 c	Inform on the quality of investigative casework	Implemented	Chief Auditor	
5 d	Assess compliance with its counter-fraud policy	Implemented	Chief Auditor.	
5 e	Ensure that in all cases accepted for investigation, all avenues of enquiry are followed up and all statements, interviews, visits, and surveillance are carried out appropriately	Implemented	Chief Auditor	Checklists have been introduced to ensure completeness of investigation
5 f	Address any inconsistencies between policy and operational practices	31-Mar-07	Chief Auditor	
5 g	Record on the fraud file advice given or sought by the Investigation team	Implemented	Chief Auditor	
5 h	Document and analyse all management checks	Implemented	Chief Auditor	
6 a	Provide fraud awareness training to employees who are involved in HB and CTB administration	Implemented	General Manager, Revenues	General Manager, Revenues has booked external training courses that will take place during the annual closedown in February 2006. This will extend to 1066 Housing Association. The on-going programme will be set out in the Business Plan. Procedures will be developed with HR whereby corporate induction for all employees will include an information leaflet about benefit fraud and a 15-minute awareness talk. Benefit staff will be provided with a more comprehensive induction. This will involve a visit to the fraud unit within 4 weeks of appointment.

Detailed Action Plan for the Achievement of DWP Performance Standards through Implementation of the BFI Recommendations

Re co	Action required	Target date	Responsible Officer	Comment
6 b	Provide a fraud awareness induction training	Implemented	General Manager, Revenues	Fraud awareness training has been completed and on line training via Merritec.
6 c	Provide regular feedback and analysis to council staff on the activities and success of fraud investigations.	Implemented	Chief Auditor	A system already exists and will be developed further, to record the number of referrals that benefit staff make to fraud. This is held on a shared drive and monitored on a monthly basis. It will capture details of referrals accepted and rejected and used to provide feedback and identify training issues.
7 a	Introduce an annual business plan for counter-fraud activity that includes:	Implemented	Chief Auditor	A Business Plan has been drafted and is being used.
7 b	planned counter-fraud activities to be carried out during the year	Implemented	Chief Auditor	Incorporated in the business plan
7 c	targets for the number of successful sanctions	Implemented	Chief Auditor	Incorporated in the business plan
7 d	resources allocated to the Investigation team and how these resources would be deployed	Implemented	Chief Auditor	Incorporated in the business plan
7 e	checks at key points when progress against the plan should be reported to senior officials and elected Members-	Implemented	Chief Auditor	Incorporated in the business plan
7 f	the risks attached to each key activity, action taken to mitigate these risks and contingency action that will be taken in the event that a risk materialises.	Implemented	Chief Auditor	Incorporated in the business plan
8 a	Review resources to ensure active pursuit of the intervention visiting target	Implemented	General Manager, Revenues	As part of the restructure, we have added 2 Visiting Officer posts to the Customer Services Team.

Detailed Action Plan for the Achievement of DWP Performance Standards through Implementation of the BFI Recommendations

Re co	Action required	Target date	Responsible Officer	Comment
8 b	publicises the documentation required to support claims and changes of circumstances which affect HB and CTB	Implemented	General Manager, Revenues	A list of documentation required to support claims and change of circumstances is published on the council's web site.
8 c	ensures that the officer verifying supporting documentation can be identified.	Implemented	General Manager, Revenues	Documents are now stamped with the full name of the verifying officer.
9 a	Reviews current post opening procedures to ensure that:	Implemented	General Manager, Revenues	A review has been undertaken. A system is now in place to allow a senior customer services officer to supervise post opening. Cheques are now cancelled on receipt and recorded in the register. Procedures are in place to ensure that there are adequate controls over the handling and transfer of cheques as well as dealing with DNR post.
9 b	there are 3 staff members in the post team so that the senior officer supervises the process and does not actively become involved	Implemented	General Manager, Revenues	
9 c	returned HB and CTB cheques are cancelled on receipt and recorded in a register	Implemented	General Manager, Revenues	
9 d	cheques are signed for by the appropriate staff member	Implemented	General Manager, Revenues	
9 e	items of value are signed for by the cashier in the presence of a senior officer	Implemented	General Manager, Revenues	
9 f	'Do Not Redirect' envelopes are sent to the Investigation team unopened.	Implemented	General Manager, Revenues	
10	Ensure that the Fraud Management System produces accurate and relevant management information to proactively monitor and control day-to-day work, identify problems and drive continuous improvement.	Implemented	Chief Auditor	We are still using spreadsheets to provide the relevant management information but the data used to form information has now been cleansed. Other fraud case management systems are still being kept under review also.
11 a	Ensure that the Prosecution Policy is reviewed to comply with Departmental guidelines	Implemented	Chief Auditor	The policy has been reviewed and revised

Detailed Action Plan for the Achievement of DWP Performance Standards through Implementation of the BFI Recommendations

Re co	Action required	Target date	Responsible Officer	Comment
11 b	Ensure that the role of the Prosecution Panel is reviewed to consistently apply its Prosecution Policy.	Implemented	Chief Auditor	The role has been reviewed and the sanctions decision-making process has been revised to ensure consistency with the new prosecution policy
12 a	Ensure that all appropriate action is taken on Fraud Partnership Agreement forms	Implemented	Chief Auditor.	
12 b	Maintains contact with the Counter-Fraud Investigation Service by having regular joint meetings which are minuted	Implemented	Chief Auditor	Regular meetings are now taking place that are minuted
12 c	Ensure that progress reports are exchanged every 3 months to enable both organisations to monitor developments in the investigation	Implemented	Chief Auditor	Dealt with through the regular minuted meetings held with FIS
13	Follow the Department's guidance when appointing and monitoring the work of authorised officers	Implemented	Chief Auditor.	Responsibility for carrying out these tasks is now embedded in the Investigation Manager's job description. This will include monitoring cases where authorised officer powers are used. The requirement to review the appointment of authorised officers for relevance and need will be contained in the business plan.
14	Develop and introduce a Benefits service-specific training plan after undertaking a training needs analysis for all staff.	Implemented	General Manager, Revenues	We are using the ESP training needs analysis. The database has been set up. Training will commence on 23rd February 2006. The training needs analysis will be extended to include the fraud staff.
15	Ensure that outcomes from investigations and overpayments are fed into a structured training programme.	Implemented	General Manager, Revenues	weekly meetings are held with the General Revenues manager where successful outcomes are reported. These are reported in the monthly benefits newsletter
16	Develop and implement a collection and monitoring policy for fraud overpayments and associated administrative penalties.	Implemented	General Manager, Revenues	The Revenues Service Delivery Plan for 2006/07, includes the production/implementation of a Collection/Recovery Policy for all debt collection under the responsibility of the General Manager, Revenues. This document will include fraud overpayments and administrative penalties.
17	Produce a business continuity plan to manage all risks to the Benefits service.	31-Mar-07	General Manager, Revenues	This is integrated within the corporate emergency plan. The key risks to service delivery are being assessed along with personnel responsible. This is being undertaken at a corporate level.
18	Ensure that all background checks, planning and preparation and proposed methods of investigation are recorded on the fraud file.	Implemented	Chief Auditor	Responsibility for carrying out these tasks is now embedded in the Investigation Manager's job description.