

Appendix 3 - NFI Self-Appraisal Checklist

Part A for those charged with Governance

Leadership, commitment and communication

Question	Yes / No/ Partly	Comments /Action required	Person/s responsible and date
1. Are we aware of emerging fraud risks, e.g. due to COVID-19, and have we taken appropriate preventative and detective action?	Yes	The initial Business Grants application and payments process required verification and checking to provide assurances that claims were valid. Grant Data will be uploaded to NFI and matches investigated as appropriate. We will also be providing details of grant payments to HMRC.	S151 Officer Council Tax and Revenues Manager
2. Are we committed to the NFI? Have the council/board, Audit Committee and senior management expressed support for the exercise and has this been communicated to relevant staff?	Yes	Local and national outcomes are reported to the Audit Committee together with any specific individual audits arising from work performed. Service area managers are often asked to pursue individual matches and they are made aware of any specific issues as necessary.	Internal Audit Manager S151 Officer
3. Is the NFI an integral part of our corporate policies and strategies for preventing and detecting fraud and error?	Yes	We are an active participant in the exercise, and it forms a fundamental part of policies and procedures to prevent and detect fraud and error.	Internal Audit Manager S151 Officer
4. Have we considered using the point of application data matching service offered by the NFI team, to enhance assurances over internal controls and improve our approach to risk management?	Yes	Licensing Section was using this, however some issues were experienced in respect of Home Office immigration data. HR also undertook a pilot using this, but it was determined that more up to date information was available elsewhere.	Internal Audit Manager S151 Officer

5. Are NFI progress and outcomes reported regularly to senior management and elected/board members (e.g., the Audit Committee or equivalent)?	Yes	Local and national outcomes are reported to the Audit Committee together with any specific individual audits arising from work performed.	Internal Audit Manager S151 Officer
6. Where we have not submitted data or used the matches returned to us, e.g. council tax single person discounts, are we satisfied that alternative fraud detection arrangements are in place and that we know how successful they are?	Yes	All data sets are submitted. However, alternative third-party contractors are used to conduct council tax single person discount checks and verification. The results from this contractor are considered robust as they can access additional data sources in order to conduct this process.	Internal Audit Manager S151 Officer Council Tax and Revenues Manager
7. Does internal audit, or equivalent, monitor our approach to NFI and our main outcomes, ensuring that any weaknesses are addressed in relevant cases?	Yes	Where appropriate Internal Audit reports are issued to service managers, and where relevant recommendations are made to improve processes.	Internal Audit Manager S151 Officer
8. Do we review how instances of fraud and error arose and use this information to improve our internal controls?	Yes	As above.	Internal Audit Manager S151 Officer
9. Do we publish, as a deterrent, internally and externally the achievements of our fraud investigators (e.g. successful prosecutions)?	Not recently	Housing benefit frauds are now investigated and prosecuted by DWP so This is out of our hands. However, if future investigations result in prosecutions these will be publicised as appropriate.	Internal Audit Manager S151 Officer

Part B for NFI SRO and Key Contacts

Planning and Preparation

Question	Yes / No/ Partly	Comments /Action required	Person/s responsible and date
1. Are we aware of emerging fraud risks, e.g. due to COVID-19, and have we taken appropriate preventative and detective action?	Yes	The initial application and payments process required verification and checking to provide assurances that claims were valid. Grant Data will be uploaded to NFI and matches investigated as appropriate. We will also be providing details of grant payments to HMRC.	S151 Officer Internal Audit Manager
2. Are we investing sufficient resources in the NFI exercise?	Yes	This issue is under constant review as competing workloads and other issues impact on available resources.	S151 Officer Internal Audit Manager
3. Do we plan properly for NFI exercises, both before submitting data and prior to matches becoming available? This includes considering the quality of data.	Yes	This is built into the Internal Audit Plan.	S151 Officer Internal Audit Manager
4. Is our NFI Key Contact (KC) the appropriate officer for that role and do they oversee the exercise properly?	Yes		S151 officer Internal Audit Manager
5. Do KCs have the time to devote to the exercise and sufficient authority to seek action across the organisation?	Yes		S151 Officer Internal Audit Manager
6. Where NFI outcomes have been low in the past, do we recognise that this may not be the case the next time, that NFI can deter fraud and that there is value in the assurances that we can take from low outcomes?	Yes	Findings are reviewed in line with other intelligence and any other processes that are in place e.g. AP Forensics.	S151 Officer Internal Audit Manager
7. Do we confirm promptly (using the online facility on the secure website) that we have met the fair processing notice requirements?	Yes		S151 Officer Internal Audit Manager

Leadership, commitment and communication

Question	Yes / No/ Partly	Comments /Action required	Person/s responsible and date
8. Do we plan to provide all NFI data on time using the secure data file upload facility properly?	Yes	All data due has been uploaded and plans are well in place for approaching deadlines to be met.	S151 Officer Internal Audit Manager
9. Have we considered using the point of application data matching service offered by the NFI team to enhance assurances over internal controls and improve our approach to risk management?	Yes	This has been trialled but has been found to be of limited value. However we are open to reconsidering this in future.	S151 Officer Internal Audit Manager
10. Do all departments involved in NFI start the follow up of matches promptly after they become available?	Yes	Internal Audit perform initial match reviews and investigations and make referrals to service areas as appropriate for further information or investigation.	S151 Officer Internal Audit Manager
11. Do we give priority to following up high-risk matches, those that become quickly out of date and those that could cause reputational damage if a fraud is not stopped quickly?	Yes		S151 Officer Internal Audit Manager
12. Are we investigating the circumstances of matches adequately before reaching a 'no issue' outcome, in particular?	Yes		S151 Officer Internal Audit Manager

Effective follow up of matches

Question	Yes / No/ Partly	Comments /Action required	Person/s responsible and date
13. (In health bodies) Are we drawing appropriately on the help and expertise available from NHS Counter Fraud Service Wales?	N/A	N/A	N/A
14. Are we taking appropriate action in cases where fraud is alleged (whether disciplinary action, penalties/cautions or reporting to the	Yes	Action is taken to recover overpayments in all cases.	S151 Officer Internal Audit Manager

Police or NHS Counter Fraud Service Wales)? Are we recovering funds effectively?			
15. Do we avoid deploying excessive resources on match reports where early work (e.g. on high-risk matches) has not found any fraud or error?	Yes	Data sources and match quality and prior outcomes are assessed as the match report review progresses.	S151 Officer Internal Audit Manager
16. Where the number of high-risk matches is very low, are we adequately considering the medium and low-risk matches before we cease our follow-up work?	Yes	Occasionally lower risk matches may provide outcomes that need further investigations.	S151 Officer Internal Audit Manager
17. Overall, are we deploying appropriate resources on managing the NFI exercise?	Yes	This does need to be kept under review as completing demands on workloads and other issues arise.	S151 Officer Internal Audit Manager