

Appendix 1: Anti-Fraud Action Plan

Ref	Action Required	Target Date	Responsibility	Notes
1	Present the strategy to CMT and agree nomination for Anti-Fraud Champion.	31/12/22	Acting Internal Audit Manager /S151 officer	High level engagement is essential for successful implementation of the strategy
2	Consult HR and Unions on the strategy.	31/12/22	Acting Internal Audit Manager /S151 officer, HR	Material to be included in induction material for new starters
3	Present strategy to wider range of members	31/12/22	Acting Internal Audit Manager /S151 officer	
4	Develop communication strategy to publicise strategy internally. Present to management network to ensure that staff are aware of their roles and responsibilities for the	28/2/22	Acting Internal Audit Manager /S151 officer, Communications	The strategy will need to be cascaded to all levels of staff so this may need a variety of different approaches to be effective. Consider sharing news / media alerts to ensure that members of staff are regularly

	prevention and detection of fraud. Promote Deter, Prevent, Detect, Investigate			kept informed of fraud risk, counter fraud news and developments.
5	Develop training advice and guidance/ reference material to signpost best practise.	31/3/22	Acting Internal Audit Manager /S151 officer, Communications	Ensure these can be easily located and are accessible. Link to development of intranet.
6	Engage with Gwent Police to develop memorandum of understanding to formalise working relationship. Fraud champion to engage at a senior level.	31/3/22	Acting Internal Audit Manager /S151 officer	
7	Ensure that fraud risk is considered in the preparation and evaluation of Service area and Directorate Risk registers	31/3/22	Risk management section	

8	Ensure that a suite of relevant and up to date policies are in place to support a strong internal control environment, a culture of prevention, and robust deterrence and investigation.	31/12/22	HR, Internal Audit, S151, Information Governance Team	A policy review and refresh to be undertaken including developing a reporting protocol, an incident action plan and investigation protocol.
9	All stakeholders (managers, Directors members) ensure that Internal Audit is adequately resourced and works to an effective risk based audit plan.	ongoing	Internal Audit , S151 officer, Governance and Audit Committee	
10	Participate in local working groups or networks.	ongoing	Internal Audit	Attend regional and national working groups and report developments to the Audit and Governance Committee as appropriate .
11	Undertake data matching exercises such as NFI and engage with any new data streams and sources	ongoing	Internal Audit , S151 officer	Engage with NFI exercise and the investigation of reported matches
12	Ensure that counter fraud awareness measures are effective and appropriate. Fraud risks are identified by means of horizon scanning, media alerts and other risk identification processes.	ongoing	Internal Audit	

