

<b>Part A</b>				
<b>for those charged with Governance</b>		<b>Yes/No/Partly</b>	<b>Is action Required?</b>	<b>Who and By When</b>
<b>Leadership Commitment and Communication</b>				
1. Are we aware of emerging fraud risks, eg due to Covid-19, and taken appropriate preventative and detective action?	Yes	Yes - regular updates are received through NAFN and CIFAS which are circulated to relevant services within the Council.  The Internal Audit Annual Audit Plan for 2020/21 includes an allocation of resource to undertake post-assurance work in relation to Covid-19. Ongoing support has also been provided to services involved in the Business Grants process and through the Organisational Resilience Group.	N/A	
2. Are we committed to NFI? Has the council/board, audit committee and senior management expressed support for the exercise and has this been communicated to relevant staff?	Yes	The responsibility for overseeing the NFI lies with Internal Audit. Internal Audit will review all aspects of NFI for the coming 2020/2021 exercise. A report will be presented to the Audit Committee outlining how the Council is engaging with the 2020/2021 exercise.	Shared Service Manager - Audit & Fraud	March 2021
3. Is the NFI an integral part of our corporate policies and strategies for preventing and detecting fraud and error ?	Yes	The NFI is included within our Anti-Fraud and Corruption Policy.	N/A	
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?	Partly	This is not something that is actively used by services. This will be considered as part of the 2020/21 NFI exercise.	Shared Service Manager - Audit & Fraud	March 2021
5. Are the NFI progress and outcomes reported regularly to senior management and elected/board members (eg, the audit committee or equivalent)?	Partly	A high level summary is provided to Committee on NFI progress but could be enhanced to report more detail on areas investigated and outcomes.	Shared Service Manager - Audit & Fraud	March 2021
6. Where we have not submitted data or used the matches returned to us, eg council tax single person discounts, are we satisfied that alternative fraud detection arrangements are in place and that we know how successful they are?	N/A	All required data sets are submitted.	N/A	
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	The responsibility for overseeing the NFI lies with Internal Audit. Internal Audit will review all aspects of NFI for the coming 2020/2021 exercise. A report will be presented to the Audit Committee outlining how the Council is engaging with the 2020/2021 exercise.  Outcomes of the NFI exercise are used to inform potential audit areas for future annual audit plans.	Shared Service Manager - Audit & Fraud	March 2021
8. Do we review how frauds and errors arose and use this information to improve our internal controls?	Partly	Outcomes of the NFI exercise are used to inform potential audit areas for future annual audit plans.  As part of the 2020/21 Annual Internal Audit Plan we will carry out a review of council tax discounts and exemptions. As part of that audit we will review processes in place to ensure the validity, completeness and accuracy of discounts and exemptions applied and recommend control improvements where required. This will include a review of errors and frauds identified by the NFI exercise.	Shared Service Manager - Audit & Fraud	March 2021
9. Do we publish, as a deterrent, internally and externally the achievements of our fraud investigators (eg, successful prosecutions)?	Yes	Published on website and during fraud awareness training internally.	N/A	

<b>Part B</b>				
<b>For the NFI Key contacts and users</b>				
<b>Planning and Preparation</b>				
1. Are aware of emerging fraud risks, eg due to Covid-19, and taken appropriate preventative and detective action?	Yes	Yes - regular updates are received through NAFN and CIFAS which are circulated by the Corporate Fraud team to relevant services within the Council.	Shared Service Manager - Audit & Fraud	Ongoing
2. Are we investing sufficient resources in the NFI exercise?	Partly	As part of the 2020/21 exercise the Corporate Fraud team will carry out review of dataset owners across the Council to ensure sufficient resources are in place.	Shared Service Manager - Audit & Fraud	February 2021
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	Quality checks on data are carried out regularly.	N/A	

4. Is our NFI Key Contact (KC) the appropriate officer for that role and do they oversee the exercise properly?	Yes	The responsibility for overseeing the NFI lies with Internal Audit. Internal Audit will review all aspects of NFI for the coming 2020/2021 exercise.  A report will be presented to the Audit Committee outlining how the Council is engaging with the 2020/2021 exercise.	Shared Service Manager - Audit & Fraud  March 2021
5. Do KCs have the time to devote to the exercise and sufficient authority to seek action across the organisation?	Yes	Sufficient allocation of resource for the NFI work is included within the 2020/21 Internal Audit Annual Audit Plan. Progress reports are submitted to Audit Committee on a regular basis.	Shared Service Manager - Audit & Fraud  Ongoing
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	This is recognised in terms of the matches received. Resources for the Corporate Fraud team's workplan are reviewed in light of the matches received and the level of outcomes for earlier exercises.	Shared Service Manager - Audit & Fraud  Ongoing
7. Do we confirm promptly (using the online facility on the secure website) that we have met the fair processing notice requirements?	Yes	This exercise is being carried out in July and August and will be confirmed using the online facility by September 2020.	Shared Service Manager - Audit & Fraud  30 September 2020
8. Do we plan to provide all NFI data on time using the secure data file upload facility properly?	Yes	Internal Audit co-ordinates the NFI exercise and a timetable is in place to meet timescales for data upload for the 2020-2021 exercise.	Shared Service Manager - Audit & Fraud  October 2020
9. Have we considered using the 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 is not something that is currently used within the Council as it attracts additional costs and the functionality requires to be reviewed for any enhancements offered. This will be considered as part of the 2020/21 NFI exercise.	Shared Service Manager - Audit & Fraud  March 2021
<b>Effective Follow up Matches</b>			
10. Do all departments involved in NFI start the follow-up of matches promptly after they become available?	Yes	Progress is monitored and followed up by the Corporate Fraud Team.	Shared Service Manager - Audit & Fraud  Ongoing
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	A full review of protocols for all services has been carried out by Internal Audit to ensure compliance. High risk matches have been fully discussed with all services and they are aware to prioritise these. This will be monitored by the Corporate Fraud Team	Shared Service Manager - Audit & Fraud  Ongoing
12. Are we investigating the circumstances of matches adequately before reaching a 'no issue' outcome, in particular?	Yes	A full review by Corporate Fraud team has been conducted to ensure all services are investigating adequately. We are satisfied that all services are full investigating matches before reaching a "no issue" outcome.	N/A
13. (In health bodies) are we drawing appropriately on the help and expertise available from NHS Scotland Counter-Fraud Services?	N/A		
14. Are we taking appropriate action in cases where fraud is alleged (whether disciplinary action, penalties/cautions or reporting to the Procurator Fiscal)? <u>Are we recovering funds effectively?</u>	Yes	Appropriate reports to PF, disciplinary action are taken, debt recovery procedures in place.	N/A
15. Do we avoid deploying excessive resources on match reports where early work (eg, on high-risk matches) has not found any fraud or error?	Yes	Reviews of results undertaken and resources based on the outcomes achieved will be deployed to other recommended or high risk matches. The Corporate Fraud team will review all services to ensure compliance.	Shared Service Manager - Audit & Fraud  Ongoing
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	The Corporate Fraud team have reviewed each service to ensure they consider the "All Matches" report. All services are aware of the "all matches" report.	N/A
17. Overall, are we deploying appropriate resources on managing the NFI exercise?	Yes	The Corporate Fraud team review resources to ensure appropriate resources are being deployed.	N/A
<b>Recording and Reporting</b>			
18. Are we recording outcomes properly in the secure website and keeping it up to date?	Yes	The Corporate Fraud team have carried out a full review of this area to ensure compliance.	N/A
19. Do staff use the online training modules and guidance on the secure website, and do they consult the NFI team if they are unsure about how to record outcomes (to be encouraged)?	Yes	Offices have found the online training helpful and if required they have been informed to consult with Internal Audit for further training/assistance. Internal Audit have also raised awareness of the online training modules with all services	N/A
20. If, out of preference, we record some or all outcomes outside the secure website, have we made arrangements to inform the NFI team about these outcomes?	N/A	All outcomes are reported in secure website.	N/A