#### **Bolsover District Council**

## **Audit Committee**

#### **12th April 2016**

#### **Internal Audit Plan 2016/17**

This report is public

#### **PURPOSE OF REPORT**

 To present to Members for consideration and agreement the Internal Audit Plan for 2016/17.

#### 1.0 Report Details

- 1.1 A key requirement of the Public Sector Internal Audit Standards is that a periodic risk based plan should be prepared that is sufficiently flexible to reflect the changing risks and priorities of the organisation. The risk based plan should be fixed for a period of no longer than one year, should outline the assignments to be carried out, their respective priorities and the estimated resources needed.
- 1.2 The internal audit plan helps to achieve the corporate aim "Strategic Organisational Development" which looks to continually improve the organisation. Systems are examined and evaluated to ensure that they are effective and efficient and that the controls in place are operating as intended.
- 1.3 A note explaining the role, purpose and some of the terminology used in the internal audit plan is attached at Appendix 1.
- 1.4 An annual report summarising the outcome of the 2015/16 internal audit plan will be presented to this Committee after the year-end.
- 1.5 A summary of the internal audit plan for 2016/17 is shown below and the detailed plan is shown as Appendix 2.

#### Internal Audit Plan 2016/17

| Summary                              | Audit Days |
|--------------------------------------|------------|
| Main Financial Systems               | 205        |
| Other Operational Audits             | 120        |
| Computer / IT Related                | 12         |
| Fraud and Corruption                 | 10         |
| Corporate / Cross Cutting            | 66         |
| Alliance Accounts/NFI Key contact    | 15         |
| Special Investigations & Contingency | 40         |

| Audit Committee / Client Liaison | 15  |
|----------------------------------|-----|
| Grand Total                      | 483 |

- 1.6 The plan has been prepared taking into account the following factors:-
  - The organisational objectives and priorities;
  - Local and national issues and risks;
  - The requirement to produce an annual internal audit opinion;
  - The fraud risk register (Appendix 3)
  - The organisations assurance framework;
  - An update of the internal audit risk assessment exercise covering the financial control and other procedures subject to audit (see Appendix 1, section 5 for further details);
  - The Council's strategic risk register and
  - The views of the Executive Director- Operations
- 1.7 Resource availability has been based on the Consortium Business Plan for 2016/17. The plan allocates 483 days to Bolsover District Council for 2016/17 this is the same allocation as for 2015/16.
- 1.8 A copy of the audit plan is provided to the Council's external auditor to assist in co-ordination of work programmes.

#### 2.0 Conclusions and Reasons for Recommendations

- 2.1 To ensure that a risk based audit plan is adopted and to determine the internal audit work programme for 2016/17.
- 2.2 To comply with the Public Sector Internal Audit Standards.
- 3 Consultation and Equality Impact
- 3.1 None
- 4 Alternative Options and Reasons for Rejection
- 4.1 Not Applicable
- 5 **Implications**

#### 5.1 Finance and Risk Implications

- 5.1.1 Financial the internal audit budget for 2016/17 has been approved by the Joint Board and includes a contingency to cover for any unforeseen circumstances etc.
- 5.1.2 Risk management Issues no formula exists that can be applied to determine internal audit coverage needs. However, as a guide the minimum level of coverage is that required to give an annual evidence-based opinion on internal controls. The level of coverage provided by the proposed 2016/17 internal audit plan will be sufficient upon which to base an opinion.

# 5.2 <u>Legal Implications including Data Protection</u>

5.2.1 None

# 5.3 <u>Human Resources Implications</u>

5.3.1 None

# 6 Recommendation

6.1 That the Internal Audit Plan for 2016/17 be agreed.

# 7 <u>Decision Information</u>

| Is the decision a Key Decision? (A Key Decision is one which results in income or expenditure to the Council of £50,000 or more or which has a significant impact on two or more District wards) | No  |
|--|---|
| District Wards Affected  | None  |
| Links to Corporate Plan priorities or Policy Framework   | The internal audit plan helps to achieve the corporate aim "providing our customers with an excellent service" which looks to continually improve the organisation. |

# 8 <u>Document Information</u>

| Appendix No   | Title                                 |  |  |  |  |  |
|---|---------------------------------------|--|--|--|--|--|
| Appendix 1  | Internal Audit Plan – Background Note |  |  |  |  |  |
| Appendix 2  | Draft Internal Audit Plan 2016/17     |  |  |  |  |  |
| Appendix 3  | Fraud risk register                   |  |  |  |  |  |
| Background Papers (These are unpublished works which have been relied on to a material extent when preparing the report. They must be listed in the section below. If the report is going to Cabinet (NEDDC) or Executive (BDC) you must provide copies of the background papers) |                                       |  |  |  |  |  |

N/A

| Report Author                     | Contact Number |
|-----------------------------------|----------------|
| Jenny Williams                    |                |
| Internal Audit Consortium Manager | 01246 217547   |

#### **INTERNAL AUDIT PLAN**

#### **BACKGROUND NOTE**

#### 1. **Definition of Internal Audit**

Internal Audit is defined in the Public Sector Internal Audit Standards as:

".. an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes".

#### 2. The Purpose of Internal Audit

Internal audit is not a substitute for management. It is the purpose of internal audit to assist and support management by appraising the arrangements and procedures established.

There is also a statutory requirement for internal audit in local government contained in the Accounts and Audit Regulations 2015. These regulations require the authority to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking in to account public sector internal auditing standards and guidance'.

#### 3. The Difference Between Internal Audit and External Audit

External audit is completely independent of the authority. The Council's external auditors are KPMG. Much of the external auditors' work is determined by statutory responsibilities. Internal audit's terms of reference are determined and approved by management.

However, there is nevertheless considerable scope for co-operation to avoid duplication of work and to make maximum use of audit resources. By reviewing the work of internal audit, external audit will be in a position to determine whether reliance can be placed on the work concerned.

## 4. The Scope of Internal Audit Work

One of the essential elements for effective internal auditing is that the internal auditor should adequately plan, control and record their work.

To determine priorities and to assist in the direction and control of audit work the internal auditor will prepare a plan based on a risk assessment.

The audit plan is divided into the following sections: -

#### Main Financial Systems

This covers the fundamental accounting and income collection systems of the authority such as payroll, creditor payments, council tax etc. Most of these systems are reviewed on an annual basis due to their importance. External audit examines and places reliance on the work carried out.

#### Other Operational Audits

Audits to be undertaken in services include a review of procedures at leisure centres and controls in respect of street cleaning.

#### IT Related

Topics in this area of the plan include a review of BACS. Although only 12 days are specifically allocated to IT, IT issues are also covered within most of the areas examined.

#### Fraud and Corruption

Audits specifically related to the prevention of fraud and corruption are covered in this area of the plan. Examples include work on recruitment and selection and NFI. It should be noted that a significant number of other audits include an anti-fraud element e.g. income audits.

#### Cross Cutting Issues

This area of the plan includes audit subjects that cover all services or are corporate Issues. Examples include work on health and safety and corporate targets.

## • Special Investigations

A contingency provision is included in the plan to cover the investigation of irregularities or cases of suspected fraud and other problems.

## 5. **Delivering the Internal Audit Service**

A three year strategic audit plan is compiled based on an internal audit risk assessment of auditable areas. This risk assessment takes into account the following factors:

- Materiality the amount of funds passing through the system
- Control Environment / vulnerability assessed level of control based on previous audit findings
- Sensitivity profile of the system in relation to customer service
- Management concerns any specific issues relating to the operation of the system e.g. Council's Strategic Risk Register

Using a scoring system, audits are then categorised as High, Medium or Low risk. This ranking is then used to compile the annual audit plan.

The areas of audit work set out in the agreed plan are split into individual audit assignments.

An audit assignment can involve:

- preparation of system notes and a review/analysis of system controls;
- > extraction of background information;
- extraction and testing of sample transactions and controls;
- > notes of interviews and meetings.

All work undertaken is recorded on detailed working papers. To ensure that all areas have been covered and appropriate conclusions reached, all working papers are independently reviewed.

A report on the findings and recommendations arising from the audit is sent to the appropriate Director and to the Executive Director of Operations at the conclusion of the audit. A response to the recommendations is requested within a set time.

A summary of internal audit reports issued each quarter is reported to the Audit Committee and an Annual Report is submitted after the end of the year detailing the outcome of the audits completed.

Appendix 2

# INTERNAL AUDIT CONSORTIUM BOLSOVER DISTRICT COUNCIL

# THREE YEAR INTERNAL AUDIT PLAN 2014/15 – 2016/17

|  | Audit Days |         |         |          |  |  |
|--|------------|---------|---------|----------|--|--|
| Main Financial Systems                               | 2014/15    | 2015/16 | 2016/17 | Priority |  |  |
| Main Accounting System                               | 15         | 9       | 9       | Н        |  |  |
| Budgetary Control                                    | 10         | 10      | 8       | Н        |  |  |
| Payroll  | 15         | 20      | 20      | Н        |  |  |
| Creditor Payments                                    | 20         | 15      | 15      | Н        |  |  |
| Debtors  | 10         | 10      | 15      | Н        |  |  |
| Treasury Management (Loans)                          | 10         | 15      | 10      | Н        |  |  |
| Cash and Banking                                     | 20         | 20      | 20      | Н        |  |  |
| Council Tax  | 10         | 10      | 20      | Н        |  |  |
| Non Domestic Rates                                   | 20         | 10      | 10      | Н        |  |  |
| Housing / Council Tax Benefit                        | 20         | 20      | 20      | Н        |  |  |
| Housing Rents  | 20         | 12      | 20      | Н        |  |  |
| Housing Repairs                                      | 20         | 20      | 20      | Н        |  |  |
| Car Allowances and Expenses                          |            | 10      |         | L        |  |  |
| Stores   |            | 10      | 10      | М        |  |  |
| VAT  | 8          |         | 8       | М        |  |  |
|  | 198        | 191     | 205     |          |  |  |
|  |            |         |         |          |  |  |
| Other Operational Audits                             | 2014/15    | 2015/16 | 2016/17 |          |  |  |
| Asset Management Arrangements                        | 10         |         |         | М        |  |  |
| Cash Floats and Balances                             | 6          | 6       |         | М        |  |  |
| Commercial Waste                                     |            | 10      |         | М        |  |  |
| Contract Accounts and Procedures                     | 15         |         |         | М        |  |  |
| Economic Development/Partnerships – Ambition funding |            |         | 10      | М        |  |  |
| Facilities Management                                | 12         |         |         | L        |  |  |
| Final Accounts                                       | 10         | 10      | 10      | Н        |  |  |
| Gas Servicing  | 8          |         | 10      | М        |  |  |
| Grants (DFG's)                                       |            | 12      |         | L        |  |  |
| Grounds Maintenance                                  | 12         |         |         | L        |  |  |
| Housing Allocations and Lettings                     | 15         |         |         | М        |  |  |
| <u>_</u>   |            |         |         |          |  |  |

| Other Operational Audits Continued      | 2014/15 | 2015/16 | 2016/17 |          |
|---|---------|---------|---------|----------|
| Insurance                               |         |         | 10      | M        |
| Leisure Centres                         | 10      | 10      | 15      | М        |
| Licensing E.Health                      | 10      |         |         | L        |
| Members Expenses and Allowances         |         | 10      |         | L        |
| Planning Fees                           |         |         | 12      | L        |
| Pleasley Outdoor Centre                 |         | 10      |         | L        |
| Property Rents/Pleasley Mill            | 10      |         |         | L        |
| Right to Buy Sales                      |         |         | 10      | М        |
| Section 106 Agreements                  | 12      |         | 12      | М        |
| Street Cleaning                         |         |         | 10      | L        |
| Taxi Licensing                          |         | 10      |         | L        |
| The Tangent Business Hub                |         | 10      |         | М        |
| Transport/Council Vehicles/fuel         |         |         | 11      | М        |
|   | 130     | 88      | 120     |          |
| IT Related                              | 2014/15 | 2015/16 | 2016/17 |          |
|   |         |         |         | М        |
| IT Policy and Security Review           | 8       |         |         | IVI      |
| PSN Compliance                          |         | 8       |         | M        |
| Use of Laptops/ removable Media         | 8       |         |         | M        |
| Social Media                            |         |         | 4       | L        |
| Disaster Recovery                       |         | 8       |         | М        |
| BACS                                    |         |         | 8       | М        |
|   | 16      | 16      | 12      |          |
|   |         |         |         |          |
| Fraud and Corruption                    | 2014/15 | 2015/16 | 2016/17 |          |
| Fraud Modules                           | 10      | 10      | 10      | <u>H</u> |
| National Fraud Initiative               |         | 5       |         | M        |
| Money laundering                        | 3       |         |         | <u>L</u> |
| Recruitment and Selection               | 10      | 10      |         | L        |
|   | 23      | 25      | 10      |          |
| Corporate / Cross Cutting Issues        | 2014/15 | 2015/16 | 2016/17 |          |
|   |         |         |         |          |
| Emergency Planning                      |         |         | 10      | L        |
| Corporate Targets                       |         | 15      | 10      | M        |
| -                                       | 1       | 1       | 1       |          |
| Corporate / Annual Governance Statement | 10      | 10      | 10      | Н        |

|                                      | 2014/15 | 2015/16 | 2016/17 |   |
|--------------------------------------|---------|---------|---------|---|
| Procurement                          | 15      | 15      |         | М |
| Financial Advice / Working Groups    | 10      | 10      | 10      | Н |
| Freedom of Information               | 6       |         |         | L |
| Risk Management                      |         | 10      |         | М |
| Safeguarding                         |         |         | 8       | М |
| Data Protection/ CCTV                |         | 10      | 10      | М |
| Transparency Agenda                  |         | 10      |         | L |
|                                      | 41      | 88      | 66      |   |
| NFI Key contact                      | 20      | 20      | 15      |   |
| Special Investigations / Contingency |         |         |         |   |
| Special Investigations Contingency   | 40      | 40      | 40      |   |
|                                      |         |         |         |   |
| Audit Committee / Client Liaison     | 15      | 15      | 15      |   |
| Grand Total                          | 587     | 483     | 483     |   |

# **BOLSOVER DISTRICT COUNCIL FRAUD RISK REGISTER**

# Prepared by Jenny Williams Date/Version Ref: march 2016 V1

| CAUSE / RISK  | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT          | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT      | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT   | RISK<br>LEAD        |
|---|---|---|---|--|---------------------------------|----------------|--|---------------------|
| Procurement/Contracts Contractor awarded contracts in return for gifts or financial incentives/bribery Contracts let to friends/relatives by waiving tendering procedures Cartels/price fixing Specification favours a particular contractor Improper award of contract No formal contract in place Contract not delivered properly/ cost overrun | Not achieving VFM Fraud Corruption Bribery Reputational Damage Potential police involvement Legal action Financial Loss | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Red | Use of NHS procurement service and electronic tendering system  Compliance with standing orders  Training and Guidance for Officers  Procurement clinics  Whistle blowing policy, Anti Fraud Bribery and Corruption policies  Contracts register  Use of Frameworks  Credit checks  Separation of duties  Supervision, authorisation controls and management structures | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow |                                 |                | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow | Service<br>Managers |

| CAUSE / RISK  | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT          | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT   | RISK<br>LEAD  |
|---|---|---|---|---|---------------------------------|----------------|--|---|
|   |   |   | Training Signed contracts Including KPI'S Budget monitoring controls Regular client/contractor meetings Internal Audit Reviews  |   |                                 |                |  |   |
| Corruption – Regeneration Development/planning consents and licences  Developer awarded contracts in return for cash or other financial incentives Inducement for the grant of planning consents/licences Backhanders to reduce restraints on developer | Not achieving VFM Fraud Corruption Bribery Reputational Damage Potential police involvement Legal action Financial Loss | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Red | Compliance with Financial Regulations  Whistle blowing policy, Anti Fraud Bribery and Corruption policies – recently revised  Contracts register  Separation of duties  Supervision, authorisation controls and management structures  Training  Internal Audit Reviews | Unlikely / Moderate (2 x 3) = Score 6 Red           |                                 |                | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow | Assist<br>Director<br>Planning.<br>Director<br>of<br>Operation<br>s |

| CAUSE / RISK   | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD |
|--|---|--|--|---|---------------------------------|----------------|--|--------------|
| Creditor Payments/Cheque Control/Procurement Cards/bank mandate fraud Internal fraud through lack of separation of duties or collusion with other officers or suppliers Senior Officers circumventing internal controls Invoices for goods not received/ inflated invoices/duplicate invoices False request to change suppliers bank details Fictitious creditors set up Unauthorised use / abuse of procurement cards for personal gain | Not achieving VFM Fraud Corruption Bribery Reputational Damage Potential police involvement Legal action Financial Loss | LIKELIHOOD                                   |  | LIKELIHOOD /  |                                 |                | LIKELIHOOD   |              |
| Use of stolen credit cards Blank cheques are stolen Fraudulent alteration and encashment of cheque payments  |   | Red  | BACS processing controls  Bank reconciliations  Verification of change of bank details requests  NFI Data matching  Inbuilt input validation controls within the system  Fraud awareness | Yellow  |                                 |                | Yellow   |              |

| CAUSE / RISK  | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT        | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT  | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD        |
|---|---|---|---|--|---------------------------------|----------------|--|---------------------|
|   |   |   | Compliance with purchasing card guidance Financial limits on procurement cards Internal Audit Reviews   |  |                                 |                |  |                     |
| Stocks and Assets/Stores  Loss of assets/stores through theft or misappropriation  Goods obtained for private use  Goods not supplied or inferior goods supplied  Theft of fuel/misuse of fuel cards  Inappropriate/ unauthorised use of Council vehicles | Theft Reputational Damage Financial Loss Police involvement | Likely /<br>Minor<br>(4 x 2) =<br>Score 8<br>Yellow | Compliance with Financial Regulations/policies  Management/supervisor y controls  Stock control/stock checks/physical controls  Authorisation of write offs and disposals  Ordering and payment controls  Monitoring of fuel issues/spend on fuel cards  Budget Monitoring Internal Audit Review  Whistleblowing Policy  Vehicle logs Mileage records | Possible /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green |                                 |                | Possible /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green   | Service<br>Managers |

| CAUSE / RISK   | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT          | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT     | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT   | RISK<br>LEAD               |
|--|--|---|---|---|---------------------------------|----------------|--|----------------------------|
| Recruitment and Selection Identity fraud Qualification fraud False References Favouritism Non disclosure of a criminal record No right to work in the UK | Fraud Staff not qualified for the job Legal proceedings Police Involvement Reputational damage Safeguarding issues | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Red | Policy in place Training in recruitment and selection process Qualification and reference checks Identity check Compliance with DBS policy Data matching NFI Internal Audit Reviews | Unlikely /<br>Moderate<br>(2*3) =<br>Score 6<br>Yellow  |                                 |                | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow | HR/Servic<br>e<br>Managers |
| Attendance/performance Falsifying time management records Home working – not working False sick claims Working whilst on sick leave                      | Fraud Reduced productivity   | Likely /<br>Minor<br>(4 x2) =<br>Score 8<br>Yellow    | Sickness policy Training Management Supervision Authorisation of flexi records etc NFI Whistle blowing policy   | Likely /<br>Negligible<br>(4 x 1) =<br>Score 4<br>Green |                                 |                | Likely /<br>Negligible<br>(4 x 1) =<br>Score 4<br>Green  | Service<br>Managers        |

| CAUSE / RISK  | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT              | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT  | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD                    |
|---|---|---|--|--|---------------------------------|----------------|--|---------------------------------|
| Payroll  Payments to "ghost" employees  Unauthorised pay increases - Fraudster increases own pay/ payments to staff for hours not worked. falsified timesheets/overtime claims  Expenses paid that have not been incurred – mileage/subsistence – falsified claims  Payment continues after resignation | Fraud Financial Loss Reputational Damage Police involvement | Likely /<br>Minor<br>(4 x 2) =<br>Score 8<br>Yellow       | Compliance with financial regulations  Payroll access controls  Confirmation of establishment lists  Input checks on variations  Payroll reconciliations Authorisation controls  Error and exception reporting. Checks carried out prior to the monthly running of payrolls  Budget Monitoring  Management supervision  Internal Audit Reviews | Unlikely /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green |                                 |                | Unlikely /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green   | Payroll/<br>Service<br>Managers |
| Benefits/Council Tax Reduction Failure to notify change of circumstances Income understated Non dependants not declared Multiple claims Landlord claims for fictitious  | Fraud Reputational Damage Financial Loss                    | Very Likely /<br>Moderate<br>(5 x 3) =<br>Score 15<br>Red | Staff training  Data Matching  Media coverage  Documentary evidence  Management  | Likely /<br>Minor<br>(4 x 2) =<br>Score 8<br>Yellow  |                                 |                | Likely /<br>Minor<br>(4 x 2) =<br>Score 8<br>Yellow    | Housing<br>Benefits             |

| CAUSE / RISK   | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT              | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT   | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD                    |
|--|---|---|--|---|---------------------------------|----------------|--|---------------------------------|
| tenant False claims by Council Officers  Council Tax/Business Rates Failure to declare occupation Exemptions/discounts claimed fraudulently Fictitious refunds Suppressing arrears | Fraud<br>Reputational<br>Damage<br>Financial Loss | Very Likely /<br>Moderate<br>(5 x 3) =<br>Score 15<br>Red | checks/supervision  DWP investigations  Fraud hotline Internal Audit Review  Access controls  Management/supervision  Separation of duties  Authorisation processes  Reconciliations  NFI/Data matching  Review of suppressed recovery action  Checking empty properties  Internal Audit Reviews | Possible /<br>Minor<br>(3 x 2) =<br>Score 6<br>Yellow |                                 |                | Possible /<br>Minor<br>(3 x 2) =<br>Score 6<br>Yellow  | Council<br>Tax                  |
| Debt Management Failure to raise an account Unauthorised amendments to account Manipulation of credit balances   | Fraud Corruption                                  | Likely /<br>Minor<br>(4 x 2) =<br>Score 8<br>Yellow       | Compliance with Financial Regulations  Management supervision  Budget monitoring   | Unlikely /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green  |                                 |                | Unlikely /<br>Minor<br>(2 x 2) =<br>Score 4<br>Green   | Debtors/S<br>ervice<br>Managers |

| CAUSE / RISK   | EFFECT  | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT         | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT   | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD                     |
|--|---|--|--|---|---------------------------------|----------------|--|----------------------------------|
| Improper write off of debt Suppressing of recovery action Falsifying refunds | Bribery Loss of income Police Involvement Reputational Damage |  | Access controls to system  Performance monitoring  Separation of duties  Authorisation of write offs  Authorisation of refunds  Bank reconciliation  Internal Audit Reviews  |   |                                 |                |  |                                  |
| Cash Income Delayed banking Theft Borrowing takings Manipulation of records  | Loss of income Fraud Reputational Damage Police Involvement   | Highly Likely  Moderate  (5 x 3) =  Score 15  Yellow | Compliance with Financial Regulations  Management supervision/authorisation  Separation of duties  Budget Monitoring  Insurance in place  Compliance with safe insurance limits  Cash collection service  Independent reconciliation of cash | Possible /<br>Minor<br>(3 x 2) =<br>Score 6<br>Yellow |                                 |                | Possible /<br>Minor<br>(3 x 2) =<br>Score 6<br>Yellow  | Cashiers/<br>Service<br>Managers |

| CAUSE / RISK  | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT                 | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT       | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT    | RISK<br>LEAD       |
|---|--|--|---|---|---------------------------------|----------------|---|--------------------|
|   |  |  | collected, bankings, tickets  Whistle blowing policy Internal Audit reviews   |   |                                 |                |   |                    |
| Petty Cash Abuse/misuse of petty cash facility  | Theft Financial Loss Possible police involvement Reputational Damage | Very Likely /<br>negligible<br>(5 x 1) =<br>Score 3<br>Green | Compliance with financial regulations and petty cash guidance  Authorisation of transactions  Separation of duties  Management/supervision controls  Reconciliation of account  Audit spot checks | Possible /<br>negligible<br>(3 x 1) =<br>Score 3<br>Green |                                 |                | Possible /<br>negligible<br>(3 x 1) =<br>Score 3<br>Green | Service<br>Manages |
| Tenancy Fraud/ Right to Buy Sub letting of properties for personal gain Providing false information to gain a tenancy Right to buy fraudulent application False homelessness applications | Fraud Police involvement Reputational Damage                         | Likely /<br>Moderate<br>(4 x 3) =<br>Score 12<br>Red         | Home visits Tenants ID checked Confirmation/checks of application information Robust tenancy agreement Eviction powers Audit Reviews  | Unlikely / Moderate (2 x 3) = Score 6 Yellow              |                                 |                | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow  | Rykneld<br>Homes   |

| CAUSE / RISK  | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT              | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT      | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT   | RISK<br>LEAD                     |
|---|--|---|--|--|---------------------------------|----------------|--|----------------------------------|
| Information Technology/Data Protection  Abuse of e mail, internet Abuse/misuse of personal or corporate information Theft/misuse of IT equipment Theft of information | Financial loss Contravention of Data Protection Act – fines Police Involvement Reputational Damage | Very Likely /<br>Moderate<br>(5 x 3) =<br>Score 15<br>Red | Compliance with policies and Codes of Conduct  Compliance with Data Protection Act  Training  Penetration/ vulnerability testing  PSN Compliance  Encryption of data transmissions  Access controls  Restricted access to internet sites  Inventory checks  Internal audit reviews | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Yellow |                                 |                | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Yellow | Service<br>Managers<br>/IT       |
| Treasury Management Alterations of terms of agreement Misappropriation of funds Fraudulent investment/repayment of funds  | Fraud Reputational Damage Financial Loss Police Involvement  | Possible / Severe (3 x 4) = Score 12 Red                  | Compliance with Financial Regulations and investment strategy and policies  Management supervision/authorisatio n  Reporting to Audit Committee  | Unlikely / Severe (2 x 4) = Score 8 Yellow               |                                 |                | Unlikely / Severe (2 x 4) = Score 8 Yellow               | Director<br>of<br>Operation<br>s |

| CAUSE / RISK  | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT          | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT            | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT         | RISK<br>LEAD                     |
|---|--|---|--|--|---------------------------------|----------------|--|----------------------------------|
|   |  |   | Access controls to system Insurance in place Separation of duties Internal Audit Review  |  |                                 |                |  |                                  |
| Declaration of Interests/Gifts and Hospitality  Failure to register interests  Failure to declare private work  Failure to declare offer or acceptance of gifts and hospitality | Corruption Bribery Reputational damage Police involvement              | Likely/<br>Moderate<br>(4 x 3) =<br>Score 12<br>Red   | Compliance with employee and members Codes of Conduct  Management and Supervision  Policy in place  Whistleblowing Policy  Anti fraud bribery and corruption policy  Internal Audit checks | Possible/ Moderate (3 x 3) = Score 9 Yellow                    |                                 |                | Possible/<br>Moderate<br>(3 x 3) =<br>Score 9<br>Yellow        | Service<br>Managers              |
| Money Laundering Use of the Council to hide improper transactions to launder money illegally  | Criminal offence Reputational Damage Financial Loss Police involvement | Unlikely/<br>Severe<br>(2 x 4) =<br>Score 8<br>Yellow | Money laundering policy Training Upper limit for cash transactions   | Highly<br>Unlikely/<br>Severe<br>(1 x 4) =<br>Score 4<br>Green |                                 |                | Highly<br>Unlikely/<br>Severe<br>(1 x 4) =<br>Score 4<br>Green | Director<br>of<br>Operation<br>s |

| CAUSE / RISK  | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT             | ACTIONS UNDERTAKEN TO MITIGATE THE RISK   | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT      | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT    | RISK<br>LEAD                     |
|---|--|--|---|--|---------------------------------|----------------|---|----------------------------------|
| Insurance Fraudulent Claims Duplicate claims at other organisations Over claiming   | Fraud Reputational Damage Potential increased insurance premiums Financial Loss Police involvement | Possible /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Yellow | Insurance Officer<br>checks claim<br>NFI<br>Internal Audit reviews  | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow |                                 |                | Unlikely /<br>Moderate<br>(3 x 3) =<br>Score 9<br>Yellow  | Director<br>of<br>Operation<br>s |
| Telecommunications  Phones are used to make private and inappropriate phone calls   | Financial loss<br>Productivity down  | Likely /<br>Negligible<br>(4 x 1) =<br>Score 4<br>Green  | Policy in place System to identify personal calls Checks on bills   | Possible / Negligible (3 x 1) = Score 3 Green            |                                 |                | Possible /<br>Negligible<br>(3 x 1) =<br>Score 3<br>Green | Service<br>Managers              |
| Grants  Preferred treatment of approved grant applications  Misrepresentation by the applicant of their financial position  Collusion  Over claiming for the value of work done/false claims  Claiming for property not owned or occupied | Reputational damage Financial Loss Police involvement  | Likely /<br>Medium<br>(4 x 3) =<br>Score 12<br>Red       | Compliance with grant policies  Management/supervisor y controls  Separation of duties  Physical verification by visits  Internal Audit Reviews | Unlikely / Moderate (2 x 3) = Score 6 Yellow             |                                 |                | Unlikely /<br>Moderate<br>(2 x 3) =<br>Score 6<br>Yellow  | Service<br>Managers              |

| CAUSE / RISK  | EFFECT   | ORIGINAL<br>RATING<br>LIKELIHOOD<br>/ IMPACT       | ACTIONS UNDERTAKEN TO MITIGATE THE RISK  | LATEST RISK<br>RATING DOT<br>LIKELIHOOD /<br>IMPACT    | FURTHER ACTION<br>REQUIRED/DATE | TARGET<br>DATE | TARGET<br>RISK RATING<br>DOT<br>LIKELIHOOD<br>/ IMPACT | RISK<br>LEAD         |
|---|--|--|--|--|---------------------------------|----------------|--|----------------------|
| Elections Fraudulent voting Fraudulent acts by canvassers Fraudulent acts by poll clerks/officers/individuals | Elections become null and void Reputational damage | Possible /<br>High<br>(3 x 4) =<br>Score 12<br>Red | Registrations and applications vetted  Training  Supervisory roles at counts  Postal votes count supervised  Ballot box controls | Unlikely /<br>Severe<br>(2 x 4) =<br>Score 8<br>Yellow |                                 |                | Unlikely /<br>Severe<br>(2 x 4) =<br>Score 8<br>Yellow | Elections<br>Officer |