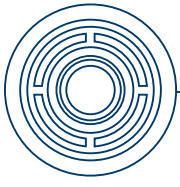


**PART**



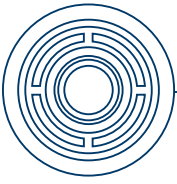
# **Social Security Agency Action Plan in Response to Recommendations**



## Social Security Agency Action Plan – Benefit Investigation Services

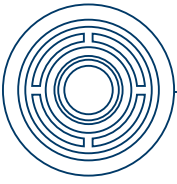
Recommendation	Accepted/ Rejected	Action to be taken and date	Responsibility of
<p>2.6 The SSA should assess and prioritise how best it can enhance public confidence through accurate and timely reporting of the progress being made in countering benefit fraud.</p>	<p>Accepted</p>	<p>The Agency has used its Publicity Campaign as a composite approach to informing the public. This umbrella operation commenced in March 2005 with a TV, newspaper and billboard strategy. The past 12 months has proved to be a success, evidenced by much greater media interest, the demand for regular Information Office press releases, culminating in early April 06 with a major series of short exposures on benefit fraud on BBC Newsline. The campaign has a reporting and evaluation mechanism the backbone of which is a series of MORI public surveys measuring the impact over the previous 12 months. This will inform the Agency's future approach, indicate lessons to be learned and enable a more focused second stage to the campaign. As a major element "It's a Rip-off" campaign is currently being developed with action planned for the remainder of the year.</p> <p>Plans to gain further public confidence are being developed through a successor to the "It's a Rip-off" campaign and will become apparent during the year to March 2007. The Agency makes use of the internet/intranet facilities to update the public and its staff on fraud awareness and more formally widely circulated Annual reports to parliament.</p> <p>Performance is and will continue to be reported in the Annual Report and Accounts.</p>	<p><b>Assistant Director Benefit Security</b></p>

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<p>2.8 The SSA needs to review with BIS Management the appropriateness and robustness of targets to deliver the optimum level of criminal sanctions in proven benefit fraud investigations and to report results in a clear and consistent manner.</p>	Accepted	<p>Over the past 9 months BIS, having recognised the need, has been reviewing its business priorities and revising its major business themes and work practices. It has expanded the work of the intelligence gathering teams and reassessed its investigation workflow. Following Director approval BIS has, from 1 April 2006, introduced a revised case-selection framework focused on achieving a greater number of sanctions/prosecutions.</p> <p>Resulting from this change in emphasis BIS performance targets are being realigned for 2006/07 to take as its primary focus challenging criminal sanctions and prosecutions targets. These are expected to obtain Director approval and be in place by end of May 2006.</p>	Director of Operations
<p>2.9 An SSA Fraud Response Plan should be developed, communicated and incorporated within training across the Agency to raise awareness of roles and responsibilities and to emphasise the corporate commitment to counter-fraud policies and initiatives.</p>	Accepted	<p>An SSA Fraud Response Plan is currently in preparation and is planned for publication by September 2006. At publication, an accompanying awareness leaflet is to be developed and made available to staff.</p>	<p>1: Assistant Director with responsibility for Benefit Security.</p> <p>2: AMB</p>
<p>2.11 To enhance accountability the SSA needs to adopt a more holistic approach to manage counter-fraud efforts to ensure that BIS operations and benefit administration is more integrated in terms of planning, performance targets and priorities to support the delivery of counter-fraud strategic objectives.</p>	Accepted	<p>Recognition of the link between BIS, Programme Protection activities and the benefit administration staff had been acknowledged some years ago by, among other things, the introduction in the benefit offices of the Fraud Liaison Officer. This role is currently under review and there is a potential for substantially expanded responsibilities taking account of vital information flows and processes in both directions between BIS and local benefit office staff. Determination of the developed role is expected by September 2006.</p> <p>Additional targets, performance measures and priorities are expected to enhance the interface role substantially.</p>	Operations Director and Assistant Directors



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<p>2.16 <b>BIS Management should identify in its reports to the AMB key risks, accurate statistical reports, priorities, options and solutions to aid decision making and provide assurance that actions accord with the strategic intent.</b></p>	<p>Accepted</p>	<p>Delegated authority lies with Director of Operations and Assistant Director of Benefit Security who will approve the business approach and reporting mechanism. BIS Business Scorecard for 2006/07, approved by the Assistant Director and aligned to and linked with the delivery of the Fraud and Error Strategy, identifies the activities appropriate for development and the related business risks. A monthly reporting system is incorporated together with a Certificate of Assurance process provided, via the Director, to the Chief Executive. All are to be in place by end of May 2006.</p>	<p><b>Operations Director and Assistant Director Benefit Security</b></p>
<p>2.17 <b>The SSA and BIS need to develop a formal counter-fraud education and awareness programme across the Agency, informed by an up-to-date understanding of fraud intelligence and results to ensure that staff recognise their responsibilities and duty to prevent fraud entering the benefits system.</b></p>	<p>Accepted</p>	<p>Agency-wide anti-fraud awareness programmes have been part of the Agency's approach since the Fraud and Error Strategy was introduced in 1999. A revised education and awareness programme is for consideration based on the recent revision of the Fraud and Error Strategy. It is expected that the revised programme will commence this year.</p> <p>As a support to this programme an Agency-wide distribution will be made to all staff of the leaflet explaining the Agency's Fraud Response Plan – see Action at paragraph 2.9 above.</p> <p>Since September 2005, when the Agency introduced regular team-time sessions, opportunities are in place for staff to gain knowledge, provide feedback and to recognise responsibilities on all business issues, which includes anti-fraud activities.</p>	<p><b>BIS and Operational Managers</b></p>

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<p>2.21 <b>BIS Management</b> should ensure that there is regular and systematic analysis of results and intelligence gathered to identify trends in benefit fraud and associated emerging risks. The analysis should also contribute to the development of business targets, allocation of resources and the continual improvement of performance, ensuring a maximum return for the application of fraud specialist resources.</p>	Accepted	<p>BIS will continue to apply analytical skills to reassess benefit fraud trends and risks. Professional statistician skills have been recruited and are being employed to assist with further analysis and development for business purposes. Direct links currently being fostered between the Department's statisticians, the Agency's programme protection planning and DWP's analytical fraud staff will assist in strengthening the BIS approach to intelligence gathering, risk identification and to enhance the approach based on lessons learned. Outcomes of this analysis will inform judgements for future business decisions.</p>	<p><b>BIS and Stats and Consultancy Branch</b></p>
<p>3.4 Immediate work needs to be carried out to complete and formalise a protocol between <b>BIS</b> and the <b>PPS</b> to clearly establish the terms of engagement, quality standards (particularly in evidence requirements) and consistency in approach for staff in both organisations.</p> <p>In addition, the <b>SSA</b> should consider the need for <b>BIS</b> to have direct access to a legally qualified and experienced person to lead the Prosecutions Team, be available to give legal directions to staff, oversee each case being prosecuted and enhance liaison with the <b>PPS</b>.</p>	Accepted	<p>Liaison with the Public Prosecutions Service (PPS) has been ongoing for some time. Discussions have taken place to resolve matters of content and volume related to cases referred for prosecution. Work has commenced on the development of a protocol between the Agency and PPS and it is being progressed as a matter of urgency.</p> <p>The Departmental Solicitor's Office (DSO) is used frequently and will continue to be used by BIS and Fraud Policy Unit (FPU). In the past a nominated officer has provided guidance, assistance and input to BIS when required, and attends and assists at meetings with PPS.</p> <p>DSO will be approached in view of the recommendation to establish a responsive support to BIS and FPU, and to ascertain whether there is potential for the provision of legally qualified support as lead to the Prosecutions Team.</p>	<p><b>PPS and BIS/FPU</b></p> <p><b>Assistant Director Benefit Security DSO</b></p>



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<p>3.5 As part of the development of its working arrangements with principal stakeholders <b>BIS Management</b> should consider the range and adequacy of targets in relation to quality and timeliness of investigations and their ability to meet common objectives.</p>	Accepted	<p>BIS management has recognised that the Social Security Fraud Act has made the processes for gathering information and evidence more complex and is dependent on third party cooperation. BIS needs to manage these to ensure volumes and timeliness are under control. To this end, Benefit Security Directorate have protocols or service level agreements with many of its main stakeholders. Within these, working relationships have been developed which in most cases meet our needs. Where they do not, discussions will take place with a view to updating agreements and protocols. In the case of formal agreements where DWP is in the lead, BIS will be dependent on DWP. The aim will be to have all agreements reviewed by April 2008.</p>	<b>FPU, BIS</b>
<p>4.2 <b>BIS Management</b> should ensure that the development of new procedural guidance is a priority and is available to all staff. It is also important that consideration is given to securing adequate resources to review and update this specialist guidance when required.</p>	Accepted	<p>Current guidance is basically up to date but it is recognised it is not user friendly. As an interim measure, it is maintained as a base manual updated on a day-to-day basis by BIS Memos supplemented by DWP Guidance. This is a non-stop activity.</p> <p>A separate FPU team is in place drafting replacement procedural guidance to consolidate the current diverse sources.</p> <p>A Northern Ireland FRAIMS Project, assisted and guided by DWP colleagues, will be developing a replacement IT system and related guidance to support the revised processes – expected delivery by September 2007.</p>	<p><b>BIS and FPU Management Teams</b></p> <p><b>FRAIMS Project</b></p>

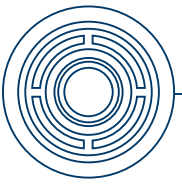
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<p>4.3 <b>BIS should review the skills, competencies and experience needed for its operations and perform an up-to-date training needs analysis to ensure that all staff are adequately supported to meet the requirements of their jobs.</b></p>	<p>Accepted</p>	<p>BIS management has recognised that specialist skills, competencies and knowledge are needed to enable the investigators to combat the increasing sophistication of the benefit fraudster. It has employed the “Professionalism in Security” training programme over the past 4 years to equip the Agency’s investigators with the appropriate skills. Training is drawn from a series of Codes of Practice to ensure investigations are focused on the wrongdoer yet controlled and monitored.</p> <p>The Agency has encouraged its staff to take a personal responsibility for their own development. The staff development process requires staff assisted by their line managers to complete an individual Personal Development Plan (PDP) and where additional or refresher training is required it is recorded. These PDPs will be reviewed in October 2006 and in April 2007. On the basis of the PDPs a training plan will be developed by May 2007.</p>	<p><b>BIS Management</b></p> <p><b>TDU</b></p>
<p>4.7 <b>BIS Management should seek other opportunities to gather regular and systematic feedback from its customer base to help measure any changes in public perceptions and learn how processes, performance and services could be improved.</b></p>	<p>Accepted</p>	<p>As indicated in the report the Agency has a comprehensive customer complaints system ensuring all complaints are addressed and any lessons to be learnt are recorded and guidance is changes when appropriate.</p> <p>Follow-up is also achieved in cases where sanctions (that is, short of prosecution) are applied. In each case investigators meet with the customer, explain the fraud and offer a sanction (a formal caution or an administrative penalty).</p> <p>As an evaluation to the “Rip-off” campaign several MORI community surveys have been planned, the latest after the last stage of the current programme. Decision on the next stage of the campaign will learn from the MORI analysis.</p> <p>Consideration will be given as to whether and, if so, how further customer information can be gathered directly from those whose cases have been taken forward for prosecution. More value may be gained following evaluation of the publicity campaign potentially for June 2007.</p>	<p><b>Assistant Director</b></p> <p><b>Benefit Security</b></p>




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<p>4.17 <b>BIS Management</b> needs to ensure that lessons learned from counter-fraud experience are shared with benefit administrators to improve the security of the benefit system.</p>	<p>Accepted</p>	<p>As an ongoing process of information sharing and lessons learnt, quarterly planning and follow-up performance meetings are held with BIS managers leading to the development of improved performance. Similarly, both formal and informal knowledge-sharing sessions are held between investigators and local decision-making administrators. The aims are to learn from past problems and develop a greater understanding and working relationship (see paragraph 2.21 above).</p> <p>The expanded role for the FLO (see paragraph 2.11 above) will contribute extensively to a greater awareness of the counter-fraud activities.</p>	<p><b>BIS Management Operational managers and FLO</b></p>
<p>4.19 <b>BIS</b> needs to review previous recommendations for improvement, assess their current relevance and implement the necessary action.</p>	<p>Accepted</p>	<p>BIS has taken forward all such-recommendations in the past. However, BIS accepts that many of the areas covered by the recommendations require constant revision and updating. A revision to the sanctions policy (which includes a prosecution policy), the review of Fraud Liaison Officer role and continuing Publicity Campaign are examples of continuous improvements to fraud processes. As part of its ongoing business development BIS will continue to revise and improve these and other linked areas.</p>	<p><b>BIS Management</b></p>
<p>5.10 <b>BIS Management</b> should liaise with <b>GMS</b> managers to develop a framework that helps determine the level, frequency and timing of <b>GMS</b> referrals to aid planning of work flows and adequacy of resources to address workload demands.</p>	<p>Accepted</p>	<p>Ongoing, BIS will continue to liaise with <b>GMS</b> managers to develop and assess workloads and work-plans. Recruitment of 15 investigators took place in year 2004/05 to bring BIS to complement. These investigators were phased-in during the summer of 2005.</p>	<p><b>BIS</b></p>



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<p>5.15 The SSA needs to re-examine the adequacy of resourcing a counter-fraud effort that is intelligence-led and based on work volumes and productivity, while recognising that not all investigations will establish fraud</p>	<p>Accepted</p>	<p>Prior to the commencement of the inspection Staff Resource Unit had been invited in to examine the BIS resource requirements. Detailed results will provide the SSA with the appropriate resource report. Analysis of the results will take account of the current financial restrictions and manpower limits imposed by government.</p> <p>From April 2006 a Criminal/ Compliance selection regime has been put in place to accommodate the drive for more focused investigations.</p>	<p><b>SRU, BIS</b></p>
<p>5.16 BIS Management should seek legal opinion on how to pursue suspected fraudsters who fail to attend interviews or keep appointments and also discuss prosecution options in such cases with the PPS</p>	<p>Accepted</p>	<p>PPS and the Departmental Solicitors Office have both been contacted and this issue is being pursued as a matter of urgency.</p>	<p><b>FPU Management</b></p>



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