



## Audit Scotland report: National Fraud Initiative in Scotland 2022

**Committee**            Audit and Standards

**Date of meeting**    9 September 2022

**Date of report**     18 August 2022

### Report by Chief Executive

#### 1. Object of report

To advise the committee on the issue of an Audit Scotland report titled '*National Fraud Initiative (NFI) in Scotland 2022*', and provide a position statement on the work completed to date to support the Partnership's participation in the 2022/2023 NFI exercise.

#### 2. Background

In August 2022, Audit Scotland published a report titled '*National Fraud Initiative in Scotland 2022*'. The report says that the continued success of the NFI is due to the commitment of participating organisations to mitigate fraud and error. The exercise is conducted every two years.

Over 130 Scottish public sector bodies participated in the 2020/2021 NFI exercise with £14.9 million of fraud, overpayment and error identified in Scotland.

Members are advised that the 2020/2021 NFI exercise identified 883 matches from 3 datasets submitted by SPT. Of these, 879 were trade creditor matches. The remaining 4 related to payroll matches (3 related to members and 1 to employees).

Audit testing analysed and investigated the matched data and found no instances of fraud. The findings of this exercise were then reported back to Audit Scotland using NFI website tools.

The NFI is linked to the statutory audit of participating bodies and the results are reported every two years by Audit Scotland. The NFI in Scotland is now well established with the 2022/2023 exercise being the eighth biennial exercise since 2006/2007. The NFI enables public bodies to take advantage of computer data matching techniques to detect fraud and error. The NFI remains the largest national fraud detection and prevention scheme that can provide data matches within and between public bodies. Its key features are that it:

- acts as a deterrent to potential fraudsters;
- identifies errors and fraud thus enabling appropriate action to be taken;
- can provide assurances, similar to a regular health check, that systems are operating well and can also identify where improvements are required;
- operates across boundaries between public bodies in different sectors and countries.

The NFI works by using data matching to compare a range of information held on bodies' systems to identify potential inconsistencies or circumstances that could indicate fraud or error which are called '*matches*'. A match does not automatically mean that there is a fraud or error and investigations are required to enable the correct conclusion to be drawn for each match. Participating bodies investigate these and record on a secure web application appropriate outcomes based on their investigations.

The full report can be found at:

<https://www.audit-scotland.gov.uk/publications/the-national-fraud-initiative-in-scotland-2022>

### 3. Outline of proposals

The following outlines the work completed to date and proposed actions to support the Partnership's participation in the 2022/2023 NFI exercise:

- Self-appraisal checklist - in accordance with good practice, Audit Scotland's self-appraisal checklist has been completed, prior to involvement in the 2022/2023 NFI exercise (see Appendix 1).
- Awareness - as part of the fraud response plan, employees and members will be made aware of the Partnership's participation in NFI via a note in their payslip and from a news article on the Intranet site.
- Timetable - datasets will be uploaded to the NFI website in accordance with prescribed timetable.
- Findings from 2022/2023 NFI exercise - a follow-up report on the outcome of the 2022/2023 NFI exercise will be presented to the Audit and Standards committee in June 2023 following investigation of '*matches*'.

### 4. Conclusions

Audit Scotland published a report titled '*National Fraud Initiative in Scotland 2022*' in August 2022. The report says that the continued success of the NFI is due to the commitment of organisations to mitigate fraud and error.

Preparatory work has been completed with further actions proposed to support the Partnership's participation in the 2022/2023 NFI exercise.

### 5. Committee action

The committee is asked to note the contents of this report and the Audit Scotland report titled '*National Fraud Initiative in Scotland 2022*' and the steps SPT has taken to date to support the next NFI exercise.

### 6. Consequences

Policy consequences	<i>In accordance with the Counter Fraud Strategy.</i>
Legal consequences	<i>The NFI exercise is carried out under powers given to Audit Scotland for data matching included in the Criminal Justice and Licensing (Scotland) Act 2010. Disclosure of and results from data matching are specified in section 26 of the Public Finance and Accountability (Scotland) Act 2000.</i>
Financial consequences	<i>None.</i>

Personnel consequences	<i>None.</i>
Equalities consequences	<i>None.</i>
Risk consequences	<i>Participation in the biennial NFI exercise mitigates fraud risk.</i>
Climate Change, Adaptation and Carbon consequences	<i>None.</i>

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**Name** Valerie Davidson

**Title** **Director of Finance & Corporate Support**

**Title** **Chief Executive**

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# National Fraud Initiative

Self-appraisal checklist



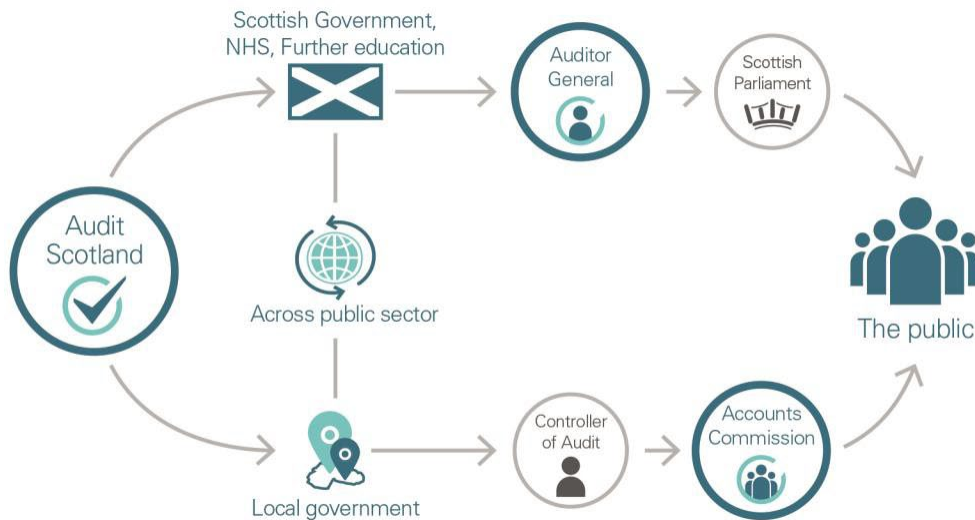
 AUDIT SCOTLAND

Prepared by Audit Scotland  
July 2020

## Who we are

The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.
- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.
- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.



## About us

Our vision is to be a world-class audit organisation that improves the use of public money.

Through our work for the Auditor General and the Accounts Commission, we provide independent assurance to the people of Scotland that public money is spent properly and provides value. We aim to achieve this by:

- carrying out relevant and timely audits of the way the public sector manages and spends money
- reporting our findings and conclusions in public
- identifying risks, making clear and relevant recommendations.

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# Background

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**1.** The National Fraud Initiative (NFI) in Scotland is a counter-fraud exercise led by Audit Scotland and overseen by the Cabinet Office for the UK as a whole. It uses computerised techniques to compare information about individuals held by different public bodies, and on different financial systems that might suggest the existence of fraud or error.

**2.** It means that public bodies can take action if any fraud or error has taken place, and it allows auditors to assess fraud prevention arrangements which those bodies have.

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# Self-appraisal checklist

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3. [Appendix 1](#) includes a two-part checklist that we encourage all participating bodies to use to self-appraise their involvement in the NFI prior to and during the NFI exercises.
4. Part A is designed to assist audit committee members when reviewing, seeking assurance over or challenging the effectiveness of their body's participation in the NFI.
5. Part B is for officers involved in planning and managing the NFI exercise.



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# How to work more efficiently

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**6.** Audit Scotland continues to encourage organisations to review and investigate NFI matches efficiently and effectively. This enables them to make better use of their limited resources. Some suggestions for improving efficiency and effectiveness are included at [Appendix 2](#).

# Appendix 1

## Self-appraisal checklist

Part A: For those charged with governance	Yes/No/Partly	Is action required?	Who by and when?
<b>Leadership, commitment and communication</b>			
1. Are we aware of emerging fraud risks, e.g. due to Covid-19, and taken appropriate preventative and detective action?	Yes. Intranet articles and email communications to staff on fraud risks.		
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. Reports to Audit and Standards committee.		
3. Is the NFI an integral part of our corporate policies and strategies for preventing and detecting fraud and error?	Yes. Counter Fraud Strategy.		
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. Matching service limited to datasets.		
5. Are NFI progress and outcomes reported regularly to senior management and elected/board members (e.g., the audit committee or equivalent)?	Yes. Reports to Audit and Standards committee.		
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?	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. NFI included in Internal Audit plan.		

<b>Part A: For those charged with governance</b>	<b>Yes/No/Partly</b>	<b>Is action required?</b>	<b>Who by and when?</b>
8. Do we review how frauds and errors arose and use this information to improve our internal controls?	Yes.		
9. Do we publish, as a deterrent, internally and externally the achievements of our fraud investigators (e.g., successful prosecutions)?	Yes. Reports to Audit and Standards committee.		

<b>Part B: for the NFI key contacts and users</b>	<b>Yes/No/Partly</b>	<b>Is action required?</b>	<b>Who by and when?</b>
<b>Planning and preparation</b>			
1. Are aware of emerging fraud risks, e.g. due to Covid-19, and taken appropriate preventative and detective action?	Yes. Intranet articles and email communications to staff on fraud risks.		
2. Are we investing sufficient resources in the NFI exercise?	Yes.		
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. NFI included in Internal Audit plan.		
4. Is our NFI Key Contact (KC) the appropriate officer for that role and do they oversee the exercise properly?	Yes. Key contact is the Audit and Assurance manager.		
5. Do KCs have the time to devote to the exercise and sufficient authority to seek action across the organisation?	Yes. NFI included in Internal Audit plan.		
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. NFI included in Internal Audit plan.		
7. Do we confirm promptly (using the online facility on the secure website) that we have met the fair processing notice requirements?	Yes.		
8. Do we plan to provide all NFI data on time using the secure data file upload facility properly?	Yes.		

Part B: for the NFI key contacts and users	Yes/No/Partly	Is action required?	Who by and when?
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. Matching service limited to datasets.		
<b>Effective follow up of matches</b>			
10. Do all departments involved in NFI start the follow-up of matches promptly after they become available?	Yes.		
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.		
12. Are we investigating the circumstances of matches adequately before reaching a 'no issue' outcome, in particular?	Yes.		
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)? Are we recovering funds effectively?	Yes.		
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.		
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.		
17. Overall, are we deploying appropriate resources on managing the NFI exercise?	Yes.		

Part B: for the NFI key contacts and users	Yes/No/Partly	Is action required?	Who by and when?
<b>Recording and reporting</b>			
18. Are we recording outcomes properly in the secure website and keeping it up-to-date?	Yes.		
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.		
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.		

# Appendix 2

## How to work more efficiently

<i>Concerns</i>	<i>How to work more efficiently</i>
Many participants are not using the latest time-saving enhancements to the NFI software.	Ensure staff within the organisations that take part in the NFI keep up-to-date with new features of the web application and good practice by reading the guidance notes and watching the online training modules before they begin work on the matches.
Matches that are time critical and could identify an overpayment are not acted on first.	Key contacts should schedule staff resources so that time-critical matches, such as housing benefit to students and payroll to immigration, can be dealt with as soon as they are received.
Investigations across internal departments are not coordinated resulting in duplication of effort or delays in identifying overpayments.	Key contacts should coordinate investigations across internal departments and, for example, organise joint investigation of single person discount matches involving housing benefit, to ensure all relevant issues are actioned.
Disproportionate time is spent looking into every match in every report.	Use the tools within the web application to help prioritise matches that are the highest risk. This will save time and free up staff for the most important investigations.
Enquiries from other organisations that take part in the NFI are not always responded to promptly.	Prioritise responses to enquiries from other organisations so investigations can be progressed.
Data quality issues that are highlighted within the web application are not addressed before the next NFI exercise.	Review the quality of the data supplied before the next exercise as external providers normally have to phase in changes to extraction processes. Better data quality will improve the quality of resulting matches.

Source: Cabinet Office NFI team

# National Fraud Initiative

## Self-appraisal checklist

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