Counter Fraud
Career progression framework
December 2024

Job Title	Range	Duties	Level A (Developing)	Level B (Practising)	Level C (Accomplished)

Counter Fraud Intelligence Analyst	Range 4	• Acting as the first point of contact for all referrals received by the team, monitoring the shared team email account and the fraud hotline, including taking accurate and detailed messages of referrals received.
		• Analysing matches received from the National Fraud Initiative (NFI) and the Kent Intelligence Network (KIN) to identify cases appropriate for investigation.
		• Setting up investigation records on the fraud case management system.
		• Carrying out risk analysis as directed by the Counter Fraud Manager and to assist in sifting referrals received.
		• Carrying out research / desktop checks and gather information connected to allegations of fraud as directed by the Counter Fraud Manager and/or Counter Fraud Officers and provide general support in the conduct of investigations.
		• Preparing written intelligence reports, outlining all enquiries undertaken and intelligence identified.
		• Acting as first point of contact for requests for information received by the team from other bodies, maintaining records of the requests received and information provided in response.
		• Acting as the Single Point of Contact (SPOC) between the Partners (Medway Council and Gravesham Borough Council) and the Department for Work & Pensions Fraud & Error Service (FES),
		  ○ Providing all requested information in accordance with Service Level Agreements,
		  ○ facilitating exchange of evidence to enable decisions,
			<u>Minimum requirements for this level.</u>
			
			<u>Qualifications</u>
			• Good standard of academic education, with 4 GCSEs Grade 4 or above (A to C) (including Maths and English), or equivalent.
			
			Knowledge
			• Awareness and understanding of data protection and confidentiality requirements.
			• Working knowledge of Microsoft Office applications, such as Excel.
			
			Experience
			• Use of Microsoft Office and/or other relevant IT applications.
			• Working with initiative, and as part of a team.
			• Analysing data from a variety of sources and systems, including manual and computer-based records.
				<u>Minimum requirements for this level.</u>
				(In addition to level A)
				
				<u>Qualifications</u>
				• As per level A.
				
				Knowledge
				• Working knowledge and understanding of data protection and confidentiality requirements.
				• Working knowledge, understanding and practical knowledge of investigation processes, related legislation, and codes of practice.
				• Basic level of understanding of local government operations.
				• Working knowledge of council computer systems, including investigation management systems.
				
				Experience
				• Minimum one year of practical experience.
				• Use of various council computer systems, including investigation management systems.
				• Understanding, and complying with legislation, policy, procedures, and guidance.
				• Working effectively with colleagues.
				• Meeting set deadlines and managing own work.
				• Logging referrals received from a variety of sources, including via email or telephone, in the investigation management system.
				• Risk assessing referrals of suspected fraud in standard areas of business, with support from experienced colleagues.
				• Reviewing data matching results, such as NFI, in standard areas of business to identify cases for investigation, with support from experienced colleagues.
				• Undertaking proactive activity, such as analysis of internal data, to identify potential fraud, with support from experienced colleagues.
					<u>Minimum requirements for this level.</u>
					(In addition to level B)
					
					<u>Qualifications</u>
					• Hold Accredited Counter Fraud Technician (ACFT) or other intelligence / Data Analysis qualification.
					
					Knowledge
					• Advanced knowledge, understanding and practical knowledge of investigation processes, related legislation, and codes of practice.
					• Advanced knowledge and understanding of data protection and confidentiality requirements.
					• Advanced working knowledge of council computer systems, including investigation management systems.
					• Good level of understanding of local government operations.
					• Advanced knowledge of Microsoft Office applications, such as Excel.
					
					Experience
					• Interpreting, understanding, and complying with legislation, policy, procedures, and guidance.
					• Risk assessing referrals of suspected fraud in standard areas of business with minimal supervision or with support from colleagues in sensitive/complex areas.
					• Reviewing data matching results, such as NFI, in standard areas of business with minimal supervision, or with support from colleagues in sensitive/complex areas, to identify cases for investigation.
					• Undertaking proactive activity, such as analysis of internal data, with minimal supervision, or with support from colleagues in sensitive/complex areas, to identify potential fraud.
					• Carrying out research and desktop enquiries related to allegations of fraud to support the conduct of investigations, with minimal

		○ dealing with notifications of case closures, and ○ maintaining records of requests received, information provided in response and case outcomes. • Attending meetings with partner organisations and complete actions associated with partnership working for the prevention and detection of crime. • Assisting council departments with the verification of information supplied on applications, as part of the council's efforts to prevent fraud entering the system. • Producing necessary information and statistics at the request of service management to enable reporting to Senior Management and Members. • Carrying out analysis of internal records and conduct internal data matching aimed at identifying instances of potential fraud. • Maintaining appropriate records of all internal data matching/analysis activity in line with GDPR requirements and council data retention policy.		• Carrying out research and desktop enquiries related to allegations of fraud to support the conduct of investigations, with support from experienced colleagues. • Preparing written intelligence reports with support from experienced colleagues. • Researching internal systems to identify information required to respond to Data Protection requests from external bodies, with support from experienced colleagues. • Gathering necessary Housing Benefit information to respond to requests from the FES, with support from experienced colleagues. • Maintaining records relating to Data Protection requests and FES requests, with support from experienced colleagues.	supervision, or with support from experienced colleagues in sensitive/complex areas. • Preparing written intelligence reports with minimal supervision, or with support from experienced colleagues in sensitive/complex areas. • Researching internal systems to identify information required to respond to Data Protection requests from external bodies, with minimal supervision. • Representing the service at multi agency meetings to gather information and feed back to the team. • Assisting council departments with the validation of information supplied with applications, with minimal supervision. • Gathering necessary Housing Benefit information to respond to requests from the FES, with minimal supervision. • Maintaining records relating to Data Protection requests and FES requests, with minimal supervision.
			Skills • Basic interpersonal and communication skills, both oral and written. • Good listening skills, being able to extract relevant and important details. • Ability to be polite and courteous when dealing with members of the public. • Ability to maintain confidentiality.	**Skills** • Ability to perform tasks professionally and with innovation; being adaptable to changing plans and priorities quickly to meet operational needs, committed, and motivated in approach. • Ability to be prioritise tasks to meet deadlines with limited flexibility, while maintaining high standards of quality. • Ability to effectively collate and interpret information from a small range of data sources. • Ability to analyse data and draw reasonable conclusions. • Ability to produce written reports presenting a variety of information in a clearly understandable way. • Ability to identify the difference between intelligence and evidence in basic areas of business. • Ability to analyse and review intelligence to assist others in decision making processes for the conduct of investigation. • Ability to maintain accurate records and statistical information, complying with legislative requirements. • Ability to deal effectively with confrontation or disagreement.	**Skills** • Ability to be prioritise tasks to meet set deadlines while maintaining high standards of quality. • Ability to effectively collate and interpret information from a wide range of data sources, including potentially complex data. • Ability to analyse large quantities of complex data, including potentially highly sensitive / complex / confidential data, to draw reasonable conclusions. • Ability to produce written reports presenting a variety of information, including potentially sensitive / complex / confidential, in a clearly understandable way. • Ability to identify the difference between intelligence and evidence in all areas of business, including highly sensitive/complex. • Ability to analyse and review intelligence to inform decision making and guide the conduct of investigation. • Well-developed interpersonal and communication skills, both oral and written, in order to communicate with a range of customers and colleagues. • Excellent listening skills, being able to extract relevant and important details. • Ability to explain tasks to others with greater depth, where required.

				• Ability to work effectively with colleagues at all levels, across a range of council services, treating all with dignity and respect. • Good interpersonal and communication skills, both oral and written, in order to communicate with a range of customers and colleagues. • Ability to explain straightforward tasks to others, where required.	
Counter Fraud Officer	Range 5	• Carrying out proactive counter-fraud work, including but not limited to: ○ developing and delivering fraud awareness training to staff at all levels and Members, ○ providing advice to management in relation to fraud risk and prevention controls, including in relation to the introduction of new systems and processes, or control weaknesses identified in the course of investigations. • Undertaking high quality investigations, both criminal and disciplinary, into allegations of varying nature and complexity, including joint investigations connected to housing benefit claims with DWP. The conduct of the investigations including but not limited to: ○ complying with all relevant legislative or council policy requirements, ○ reviewing allegations and associated intelligence to prepare detailed investigation plans, ○ collecting, recording, and retaining all evidence, ○ analysing and evaluating information/evidence obtained, including highly complex/sensitive and/or confidential information, ○ following any and all appropriate lines of enquiry, ○ undertaking visits to residential homes or places of business as necessary, ○ obtaining witness statements, suitable for criminal/civil courts as necessary,	**<u>Minimum requirements for this level.</u>**	**<u>Minimum requirements for this level.</u>** (In addition to level A)	**<u>Minimum requirements for this level.</u>** (In addition to level B)
			Qualifications • Good standard of academic education, with 4 GCSEs Grade 4 or above (A to C) (including Maths and English), or equivalent.	**Qualifications** • Hold Accredited Counter Fraud Specialist (ACFS) or equivalent.	**Qualifications** • Hold accreditation or certification in a specialist area e.g., fraud risk assessment, fraud prevention, counter bribery & corruption, cyber/digital fraud.
			Knowledge • Awareness of investigation processes, related legislation, and codes of practice. • Awareness and understanding of data protection and confidentiality requirements. • Working knowledge of Microsoft Office applications, such as Excel.	**Knowledge** • Well-developed understanding and practical knowledge of investigation processes, related legislation, and codes of practice. • Well-developed knowledge and understanding of data protection and confidentiality requirements. • Good level of understanding of local government operations. • Working knowledge of council computer systems, including investigation management systems	**Knowledge** • Detailed understanding and practical knowledge of investigation processes, related legislation, and codes of practice. • Detailed knowledge and understanding of data protection and confidentiality requirements. • Detailed understanding of local government operations. • Detailed knowledge of council computer systems, including investigation management systems.
			Experience • Experience of using of Microsoft Office and/or other relevant IT applications. • Experience of working with initiative, and as part of a team. • Experience of analysing data from a variety of sources and systems, including manual and computer-based records.	**Experience** • Use of various council computer systems, including investigation management systems. • Interpreting, understanding, and complying with legislation, policy, procedures, and guidance. • Working effectively with colleagues and external partners. • Meeting multiple deadlines and managing own work. • Undertaking end to end investigations, including interviewing, obtaining witness statements, and preparation of sanction/prosecution papers as required, with support from experienced colleagues. • Undertaking proactive fraud reviews, with support from experienced colleagues. • Preparing written reports and suggesting management actions to address potential risks with support from experienced colleagues.	**Experience** • Minimum two years post accreditation experience: ○ Interpreting, understanding, complying with, and providing basic advice on, legislation, policy, procedures, and guidance. ○ Working effectively with colleagues and external partners. ○ Meeting multiple deadlines, including some non-negotiable, and managing own work. ○ Undertaking end to end investigations, including interviewing, obtaining witness statements, and preparation of sanction/prosecution papers as required, with minimal supervision. ○ Undertaking proactive fraud reviews, with minimal supervision. • Preparing written reports and agreeing management actions to address identified risks with minimal supervision.

		○ undertaking surveillance in line with relevant legislation as necessary, ○ interviewing subjects as required, and where necessary in line with appropriate codes of practice, ○ maintaining accurate case files, ○ producing evidential summaries to enable evidence-based decision making by council departments, and approval of appropriate sanctions by counter fraud management, ○ preparing papers for prosecution as appropriate, ensuring that cases meet evidential standards requirements. • Preparing high quality, compelling, investigation reports at the conclusion of investigations to present at disciplinary hearings, as necessary. • Presenting findings of investigations and counter-fraud work to clients, including details of identified weaknesses in control processes and liaise with client management to ensure these are addressed where practical. Liaising, and representing the team at meetings, with internal departments, partners, and other external agencies as required.			• Attending meetings with internal departments of both partners, providing basic advice on fraud prevention and control. • Representing the service at meetings with partner organisations and agencies.
			Skills • Ability to perform tasks professionally. • Good interpersonal and communication skills, both oral and written. • Excellent listening skills, being able to extract relevant and important details. Ability to maintain confidentiality.	**Skills** • Ability to perform tasks professionally and with innovation; being adaptable to changing plans and priorities quickly to meet operational needs, committed, and motivated in approach. • Ability to be prioritise tasks to meet required deadlines, with limited flexibility, while maintaining high standards of quality. • Ability to work with minimal supervision, making decisions in line with regulations, legislation, and established procedures, referring to supervisor/line manager, as necessary. • Ability to analyse and review evidence to guide the course of investigations and inform potential further action. • Ability to produce written reports presenting a variety sensitive / confidential information in a clearly understandable way, including detailed investigation reports, with recommendations for appropriate action, in accordance with regulations, legislation and established procedures. • Well-developed interpersonal and communication skills, both oral and written, in order to communicate with a range of customers and colleagues. • Ability to use good negotiation and persuasion skills to agree management actions. • Ability to maintain accurate records and statistical information, complying with legislative requirements. • Ability to be polite and courteous when dealing with members of the public. • Ability to deal effectively with confrontation or disagreement, including capability to identify and diffuse difficult situations e.g., irate and/or potentially violent members of the public. • Ability to work effectively with colleagues at all levels, across a range of council services, treating all with dignity and respect. • Ability to explain straightforward tasks to others, where required.	**Skills** • Ability to be prioritise tasks to meet non-negotiable deadlines while maintaining high standards of quality. • Ability to work with minimal supervision, making decisions in line with regulations, legislation, and established procedures, referring to supervisor/line manager as necessary in sensitive/complex areas. • Ability to analyse large quantities of data, including potentially highly sensitive / confidential data, and draw reasonable conclusions. • Ability to analyse data, including potentially sensitive / confidential data, and draw reasonable conclusions. • Ability to produce written reports presenting a variety of sensitive / complex / confidential information in a clearly understandable way, including detailed investigation reports, with recommendations for appropriate action, in accordance with regulations, legislation and established procedures. • Highly developed interpersonal and communication skills, both oral and written, in order to communicate with a range of customers and colleagues. • Ability to use well developed negotiation and persuasion skills to influence management into taking appropriate actions. • Ability to provide general information, advice and guidance on internal procedures relating to finance and employees, specifically in relation to fraud prevention or the investigation of disciplinary matters. • Ability to explain tasks to others with greater depth, where required.
	Range 7	• To manage all aspects of operational counter fraud activity, including	**<u>Minimum requirements for this level.</u>**	**<u>Minimum requirements for this level.</u>** (In addition to Level A)	**<u>Minimum requirements for this level.</u>** (In addition to Levels A&B)

Counter Fraud Manager		designing and maintaining day to day processes and procedures in line with appropriate legislation and codes of practice. • To support the Counter Fraud Intelligence Analysts, to deliver high-quality intelligence work across both councils, in line with legislative, and council policy, requirements as appropriate. • To support the Counter Fraud Officers in the preparation and delivery of fraud awareness training, reviewing proposed presentations and training materials. • To support the Counter Fraud Officers to deliver high-quality investigation work across both councils, in line with legislative, and council policy, requirements as appropriate. • To review completed investigations, authorising closure or making objective decisions in relation to appropriate sanctions, including prosecution. • To support Counter Fraud Officers in the preparation of, and reviewing, case papers to be presented to legal services for instigation of proceedings. • To be responsible for the health and safety of officers working outside the office environment. • To provide a robust quality control review for all counter fraud work, ensuring work is complete, accurate and that actions recommended by officers are sound. • To carry out quality reviews of reports produced as a consequence of counter fraud activity. • To support the Counter Fraud Officers to present findings to clients, including agreeing any further action required. • To support all officers in the Counter Fraud team with their continuous professional development. • To be responsible for day-to-day line management of all officers in the Counter Fraud Team.	**Qualifications** • Accredited Counter Fraud Specialist (ACFS) or equivalent	**Qualifications & Training** • Accredited Counter Fraud Manager (ACFM) or equivalent. • All relevant managerial training completed.	**Qualifications & Training** • As per Level B. •
			Knowledge • Detailed understanding, and practical knowledge, of techniques, processes, legislation, and codes of practice associated with investigations, interviewing and the prosecution of offenders. • Detailed knowledge and understanding of data protection and confidentiality requirements. • Working knowledge of investigation management systems. • Working knowledge of employment law relating to disciplinary and grievance matters.	**Knowledge** • Detailed knowledge of investigation management systems. • Detailed knowledge and understanding of council policies, and procedures.	**Knowledge** • Detailed knowledge and understanding of corporate practices, including reporting lines. • Detailed understanding of local government operations.
			Experience • Experience of using of Microsoft Office and other relevant IT applications, including investigation management systems. • Experience of working with initiative, and as part of a team. • Significant experience of: ○ Interpreting, understanding, complying with, and providing detailed advice on, legislation, policy, procedures, and guidance. ○ Working effectively with colleagues at all levels, and external partners, in relation to highly sensitive and/or confidential areas of business. ○ Meeting multiple deadlines, including non-negotiable, and managing own work. ○ Undertaking high quality, complex, end to end investigations, including interviewing, obtaining witness statements, and preparation of sanction/prosecution papers as required, independently or with minimal supervision. ○ Undertaking proactive counter fraud activity, such as data matching or targeted fraud drives, independently or with minimal supervision. • Independently preparing written reports and agreeing management actions to address identified risks. • Attending meetings with internal departments, providing advice on fraud prevention and control.	**Experience** • Minimum two years' experience of working in Local Government counter fraud function at managerial level. • Minimum two years' experience of line managing staff in line with council policies and procedures. • Minimum two years' experience of supervising investigation work in line with legislative requirements, including giving and receiving positive feedback and constructive criticism. • Experience working in a shared service, or equivalent, role. • Experience of authorising cases for appropriate criminal sanctions, including referral for prosecution. • Experience of attending meetings with internal departments, providing detailed advice fraud risk and control. • Experience of liaison with other local authorities and external agencies to facilitate joint working. • Experience of assessing fraud risks and creating/maintaining fraud risk registers. • Experience of managing and monitoring budgets. • Experience of providing detailed information, advice and guidance on internal policies and procedures relating to finance, specifically in relation to fraud prevention. • Experience of providing detailed information, advice and guidance on internal policies and procedures that impact on the health and	**Experience** • Minimum four years' experience of line managing staff in line with council policies and procedures. • Minimum four years' experience of working in Local Government counter fraud function. • Minimum four years' experience of supervising investigation work in line with legislative requirements, including giving and receiving positive feedback and constructive criticism. • Experience of preparing and presenting written reports to Corporate Management Teams and/or elected Member Committee's.

		• To independently plan and conduct end to end criminal / disciplinary / grievance investigations of a highly complex and/or sensitive nature. This may require interviews adhering to appropriate Codes of Practice and undertaking surveillance in line with relevant legislation. • To discuss with senior management any findings of a particularly complex and/or sensitive nature and agree appropriate solutions. • To assist the HIACF with designing and maintaining performance measurement mechanisms for both individual officers and the Counter Fraud Team as a whole, including customer satisfaction. • To monitor the performance of the Counter Fraud Team and calculate performance outturns in line with quarterly and Committee reporting periods. • To identify key risk areas for potential counter fraud activity and advise the HIACF for consideration of inclusion in counter fraud plans. • To conduct fraud risk assessments in departments of both councils based on nationally recognised areas of fraud risk to assist the HIACF with the production of fraud risk registers. • To champion services available from counter fraud and provide high level advice and support to officers and managers of both councils on counter fraud matters, including fraud risks and the design of relevant controls. • To promote a strong anti-fraud and corruption culture at both councils by raising awareness of fraud, bribery, and corruption through training, presentations, and publicity campaigns. • To maintain a detailed and up-to-date working knowledge of legislation and guidance linked to the investigation of criminal and employee disciplinary related matters and ensuring any changes are embedded in the operational activity of the team.	• Representing a service or team at meetings with partner organisations and agencies. • Experience of providing general information, advice and guidance on internal policies and procedures relating to finance, specifically in relation to fraud prevention. • Experience of providing general information, advice and guidance on internal policies and procedures that impact on the health and wellbeing of people, specifically in relation to fraud prevention. • Experience of providing general information, advice and guidance on internal policies and procedures relating to employees, specifically in relation to fraud prevention or disciplinary/grievance investigations.	wellbeing of people, specifically in relation to fraud prevention. • Experience of providing detailed information, advice and guidance on internal policies and procedures relating to employees, specifically in relation to fraud prevention • Experience of attending Corporate Management Team and Committee meetings with Members.	
			Skills • Ability to perform tasks professionally and with innovation; being adaptable to changing plans and priorities quickly to meet operational needs, committed, and motivated in approach. • Ability to work flexibly to changing needs, prioritising work to meet multiple non-negotiable and potentially short deadlines while maintaining high standards of quality. • Ability to work independently, making decisions in line with regulations, legislation, and established procedures, without access to supervisor/line manager, where necessary. • Ability to analyse large quantities of complex data, including highly sensitive and confidential data, to draw reasonable conclusions. • Ability to analyse and review large quantities of evidence to guide the course of investigations and inform potential further action. • Ability to produce written reports presenting a variety of highly sensitive / complex / confidential information in a clearly understandable way, including detailed investigation reports, with recommendations for appropriate action, in accordance with regulations, legislation and established procedures. • Ability to use highly developed interpersonal and communication skills, both oral and written, in order to communicate with a range of customers and colleagues. • Excellent listening skills, being able to extract relevant and important details.	**Skills** • Ability to plan projects and tasks in a structured way, monitor progress and report on outcomes. • Ability to be objective and apply reasoned judgement to make sound decisions in relation to potential criminal sanctions as a consequence of investigations. • Ability to provide detailed information, advice and guidance on internal policies and procedures relating to finance, employees, and that impact on the health and wellbeing of people, specifically in relation to fraud prevention or the investigation of disciplinary matters. • Ability to manage and monitor set financial budgets, providing forecasts as required.	**Skills** • Ability to clearly present reports to Members with courtesy and professionalism. • Ability to deal effectively with questions from Members while remaining apolitical.

		• To Assist the HIACF with preparation of reports for the Audit Committee of both councils. • To liaise with and represent the team at meetings with internal departments, partners and other external agencies as required; including taking positions on corporate working groups, as required, to support the implementation of key policy and procedure changes. • To lead on the liaison between both councils and the Department for Work & Pensions in regard to their investigation of Housing Benefit fraud. • To act as budget manager for the Counter Fraud Team, monitoring team budget codes and completing forecasts as required. • To deputise for the HIACF as required in relation to counter fraud matters, including reporting to officers and Members.	• Ability to use highly developed negotiation and persuasion skills to influence management into taking appropriate actions. • Ability to maintain accurate records and statistical information, complying with legislative requirements. • Ability to be polite and courteous when dealing with members of the public. • Ability to deal effectively with confrontation or disagreement, including capability to identify and diffuse difficult situations e.g., irate and/or potentially violent members of the public. • Ability to work effectively with colleagues at all levels, across a range of council services, treating all with dignity and respect. • Ability to maintain confidentiality. • Ability to take responsibility for line managing others, providing direction, monitoring progress, and empowering them to achieve objectives. • Ability to coach and support staff undertaking professional qualification training or maintaining continual professional development.		