A commitment to countering fraud

In May 2018, seven counter fraud professionals from the Student Awards Agency Scotland (SAAS) and West Lothian council became the first in the country to receive the Scotland Accredited Counter Fraud Specialist (ACFS) award – a version of the ACFS qualification specifically tailored by CIPFA for Scottish legislative and legal requirements.

The CIPFA ACFS qualification is designed for practitioners whose work roles are concerned with counter fraud and anti-corruption activities. It is a professional qualification and the core syllabus is set by the Counter Fraud Professional Accreditation Board (CFPAB) in conjunction with the University of Portsmouth’s Centre for Counter Fraud Studies.

SAAS is the national student funding body for eligible Scottish and EU students doing a higher education course at college or university. SAAS is an Executive Agency of the Scottish Government and provides funding to over a quarter of a million students each year and is responsible for a budget of around £900 million annually for tuition fees, loans and bursaries. The role of SAAS’s Counter Fraud team is therefore vital in detecting and identifying fraudulent applications for student support.

The ACFS programme was developed by the CFPAB some time ago and over the years around 20,000 professionals have attained the award. It has been offered by CIPFA in England and Wales since 2015. However, in Scotland while there was a growing demand from the public sector for this qualification, no provider was offering a similar programme tailored to the Scottish counter fraud market that reflected the differences between English and Scottish criminal law and procedure.

Graham Philp is Head of Counter Fraud and Recoveries at SAAS. He explains:

‘This sort of training plays an important role in improving the consistency of practice and operational standards across the public sector ensuring that counter fraud governance is as strong as it can be.'

Graham Philp
Head of Counter Fraud and Recoveries, SAAS
“It is important to have this training to build on our technical skills to allow us to respond and react quickly to the changing fraud environment, taking into consideration digital transformations and our ability to gather and record evidence. It is important for those in the public sector to have the required knowledge and skills to maintain an effective approach and to allow us to work across organisational boundaries.”

**Meeting the challenge head on**

Fraud is the most common acquisitive crime in the UK, and is increasing year on year. A **2018 report** estimated that fraudulent activity costs the UK £110 billion annually, while Government estimates that £31 billion to £49 billion of public sector money is lost to fraud and error each year. Providing professionals working in the public sector with the knowledge and complex set of skills to investigate and combat it is, therefore, vital. With public sector budgets tight and organisations under intense pressure to make savings, clamping down on and reducing fraud is one area where this can be achieved.

The UK Government has acknowledged the growing importance of counter fraud professionalism. On 9 October 2018, it launched its new Government Counter Fraud Profession (GCFP) for specialists working to fight fraud and economic crime, with the aim of creating a new community of counter fraud specialists across government. The GCFP is aimed at enhancing the structure of the government’s counter-fraud capability and putting the UK Government in a better position to find and fight fraud and economic crime. Practitioners therefore need specialist professional training in order to meet the needs of the profession.

In 2015 the Scottish Government launched a new counter fraud strategy, which outlines the Scottish Government’s commitment to fighting fraud with an enhanced emphasis on prevention. “SAAS’s strategic goals are directly aligned to this,” says Philp, “and as we are responsible for administering public funds, we also have a responsibility to protect those resources and to improve the organisation’s resilience to fraud.

‘Professional training plays an important part in helping us to achieve this. We work very closely with a range of counter fraud partners in both Scotland and the rest of the UK, and it is important that we are recognised as a professional body in this area to enable us to work together with other agencies.’

**A bespoke solution**

CIPFA tailored the Scotland ACFS course for the Scottish market by ensuring that Scottish legislation, terminology and common law was applied to the course material. While the overarching principles of the law on either side of the border are similar, the criminal justice systems are quite different and interpretation and application in Scotland can differ significantly.

SAAS and CIPFA worked closely together on this and a review of the law and criminal procedure formed part of the discussion at every stage of the course.

“CIPFA was very flexible in allowing us to contribute, and our trainer in particular very much welcomed us sharing our knowledge and expertise in this area,” says Philp.

Similar to its English counterpart, the Scottish ACFS course comprises four modules of classroom-based learning over 18 days, taught over three to four months, with an additional eight days of pre-course, self-directed learning and 18 days to complete three course assignments.

SAAS elected to send its entire four-strong investigations element of the counter fraud team plus two other managers to attend the course rather than just selected individuals, ensuring that all members were able to receive the high quality CIPFA training as a unit.

Philp explains: ‘A great deal of personal commitment and time was required for the course, spending four weeks out of the office and completing assignments while continuing to manage individual casework. But working through this as a team provided motivation and a sense of camaraderie – with an occasional element of healthy competition.

‘It wasn’t all just about the hard work, though – the practical activities were good team building exercises, and the training environment allowed for free-flowing discussion. This added benefit continued after the training was complete too. When it came to reviewing our processes, it meant that each team member was involved in decision-making and were able take ownership in re-shaping and implementing new practices.’
Pathway to success

After the successful completion of the course, SAAS undertook a full review of its operating procedures, adapting and enhancing them where appropriate.

“Our team members have always been committed to the work that we do,” says Philp, “but SAAS investing in our professional development and the achievement of the award has given an added sense of enthusiasm to the team.

‘Gaining this award has also raised our profile among partners, and we have received recognition by the wider Scottish Government for leading the way as the first Scottish Government team to achieve this qualification.’

Philp believes that the CIPFA training and access to its resources are also a valuable long-term investment for SAAS. “This course consolidated our knowledge and formalised our skills, but it hasn’t just been about that immediate gain. In the long term, access to resources, tools and continuous professional development will allow us to maintain this standard and will offer specialist support in building an anti-fraud culture.

“The UK government has recently launched counter fraud as a profession in the civil service ensuring recognition for individuals working in this area of expertise. Gaining this accreditation, which is already aligned to the Cabinet Office counter fraud standards framework, means that we are a step closer to reaching our potential in this area.”

CIPFA Accredited Counter Fraud Specialist

The CIPFA Accredited Counter Fraud Specialist (ACFS) is focused on developing the counter fraud knowledge and skills required for effective end-to-end management of fraud.

Featuring case studies drawn from across public bodies, the CIPFA ACFS syllabus has been set by the Counter Fraud Professional Accreditation Board in conjunction with the University of Portsmouth’s Centre for Counter Fraud Studies. It examines economic crime through practical scenarios and best practice counter fraud methodologies.

CIPFA ACFS courses conducted in Scotland refer specifically to Scottish legislation and sources of law.

For full course details and upcoming dates, visit: www.cipfa.org/acfs

To learn more about the CIPFA Counter Fraud Centre, visit: www.cipfa.org/counterfraudcentre