

National Fraud Authority Framework Agreement

June 2012

CONTENTS

Foreword by The Parliamentary Under Secretary of State for	
Crime and Security	3
Introduction	4
Aim and Objectives	5
Roles and responsibilities	6
Policy	10
Relationship with Parliament, key delivery partners and other bodies	11
Planning and performance	13
Financial management	15
People	19
Provision of shared corporate services for the NFA by the Home Office or other departments	21
Review, amendment and publication of the framework document	25

Foreword by The Parliamentary Under Secretary of State for Crime and Security

As the Minister for Crime and Security I am presenting this Framework Agreement between the Home Office and the National Fraud Authority (NFA), an Executive Agency with responsibility for delivery of functions dedicated to improve this country's resilience to fraud.

As the lead government department for crime, the Home Office sets the policy and strategic framework for combating fraud. Fraud is a serious crime that affects all sectors of the economy and all parts of our society causing estimated losses of £73bn. The fight against fraud is made more effective by working in partnership across all sectors to prevent fraud and improve the enforcement response. It is the role of the National Fraud Authority to lead and co-ordinate this work engaging with partner organisations from the public, private and third sectors, as well as enforcement agencies.

This Framework Agreement sets out the strategic objectives, responsibilities and lines of accountability of the National Fraud Authority. It also sets out how the Home Office provides a number of support services to the NFA to allow the NFA to focus on its core functions and to ensure value for money in the use of Home Office resources and assets.

The work of the National Fraud Authority is currently set against the backdrop of the development of the National Crime Agency and within that the Economic Crime Command. These are important introductions to the economic crime landscape demonstrating this Government's commitment to improving the response to economic crime, including fraud, through prevention and enforcement. The National Fraud Authority has been involved in this work from the start, as a member of the Economic Crime Co-ordination Board (the precursor to the Economic Crime Command) and through chairing the Economic Crime Prevention Group which monitors delivery of Fighting Fraud Together which forms the basis of the strategy to be followed by the Economic Crime Command.

JAMES BROKENSHIRE MP

Introduction

The National Fraud Authority (NFA) was established as an executive agency of the Attorney General's Office on 1 October 2008. Given the strong relationship between tackling fraud and wider economic crime and the importance of maintaining a close relationship with the police and other law enforcement agencies, the NFA became an executive agency of the Home Office on 1 April 2011.

- 2. The NFA leads and co-ordinates the fight to reduce fraud affecting individuals and the private, public and voluntary sectors. It works in close partnership with all these sectors and law enforcement and regulators. In addition to its leadership and coordination roles, it delivers Action Fraud, the national reporting centre for victims and potential victims of fraud and financially motivated internet crime.
- 3. The NFA is located at 2 Marsham Street, London, SW1P 4DF. As of 1 April 2012, it employed 50.6 FTE staff and also made use of unpaid secondees funded by partners. Its budget for 2012/13 is £9.1 million which includes funding earmarked for the contracted out components of Action Fraud and for grants to the City of London Police for some of its functions as the National Lead Force for Fraud.

Aim and Objectives

Aim

4. The NFA aims to be the acknowledged champion of the country's fight against fraud, driving effective collaborative efforts and the sharing of good practice across all sectors so that by 2015 our country will be demonstrably more resilient to and less damaged by fraud.

Objectives

- 5. The NFA's objectives are:
 - To protect the public by overseeing the implementation of *Fighting Fraud Together*, the cross sector strategic plan to reduce fraud including producing measures of the effectiveness of the strategy
 - To lead and co-ordinate activities under the awareness and prevention strategic objectives of *Fighting Fraud Together*
 - To refresh Fighting Fraud Together in consultation and collaboration with stakeholders and ensure its continued alignment with related strategies such as Local to Global: Reducing the Risk from Organised Crime and The UK Cyber Security Strategy: Protecting and Promoting the UK in a Digital World
 - To measure the scale and breakdown of the cost of fraud to the country
 - To deliver the Action Fraud service, the national reporting centre for fraud and internet crime
 - To operate efficiently and effectively within its resources.

Key performance indicators

6. The NFA's key performance indicators are set out annually in its business plan.

Roles and responsibilities

Ministers

- 7. The Home Secretary holds overall responsibility for the Home Office and its policies. The Home Secretary has responsibility for:
 - Setting the strategic direction for the NFA, its objectives, performance indicators and financial targets
 - Determining the policy and organisational framework within which the NFA operates
 - Approving the NFA Business Plan and its use of resources allocated under the spending review and via other programmes and sources
 - Holding the Chief Executive to account for the performance of the NFA and the delivery of its objectives
 - Approving revisions to the Framework Agreement.
- 8. The Home Secretary may delegate these responsibilities to other Ministers in the Department.

The Permanent Secretary

- 9. The Permanent Secretary is the Home Office's Principal Accounting Officer and is accountable to Parliament for the Department's overall effectiveness and delivery. In this capacity, the Permanent Secretary holds the Chief Executive to account for the efficiency and effectiveness of the NFA.
- 10. The Permanent Secretary is the principal advisor to the Home Secretary on matters affecting the Department as a whole, including questions relating to the allocation of resources, expenditure and finance.
- 11. The Director General of Crime and Policing has been appointed by the Permanent Secretary to act as the Departmental Sponsor of the NFA. He may delegate day-to-day sponsorship activities to his staff.

The NFA Sponsor

12. The sponsor is responsible for:

- Advising the Home Secretary on the strategic direction of the NFA in the context of wider Departmental or cross-governmental objectives
- Advising the Home Secretary on the NFA's use of resources allocated in the spending review and via other programmes and sources, its key performance indicators and its Business Plan
- Setting the framework for strategic performance management and regularly reviewing the NFA's performance and delivery
- Advising the Home Secretary on strategic performance information about the NFA
- Ensuring that the NFA has the delegations and authorities necessary for effective delivery and continuous improvement
- Informing the Chief Executive of Home Office policy developments that might impact upon the NFA
- Ensuring that the Home Office auditors retain and are able to use a right of access to the NFA to conduct investigations on behalf of the Permanent Secretary as Principal Accounting Officer.
- 13. The sponsor will line manage the Chief Executive of the NFA and gather information about the performance of the NFA from:
 - The NFA Chief Executive
 - The NFA's Non-Executive Directors
 - The Home Office Sponsorship Director
 - The Home Office Accounting and Finance Unit
 - The NFA's partners.

The Chief Executive

- 14. The Chief Executive is responsible and accountable to the Home Secretary for:
 - The work of the NFA in leading and co-ordinating activity to reduce fraud within the agreed national strategic framework
 - The efficient and effective management of the NFA.
- 15. The Chief Executive is a civil servant and subject to the Civil Service Code.

- 16. The Chief Executive is the NFA's accounting officer and must run the NFA in compliance with the Treasury document "Managing Public Money", in particular with regard to the accounting officer responsibilities set out in Chapter 3. The personal responsibilities are set out in the Accounting Officer letter of appointment from the Permanent Secretary. The responsibilities include:
 - Signing the formal accounts of the NFA, in accordance with the Accounts
 Direction which will be issued by the Treasury after consultation with the
 Home Office and the NFA and in doing so accept personal responsibility for
 their proper presentation as prescribed by the Treasury
 - Signing the NFA's Annual Report and the Governance Statement
 - Ensuring that proper financial procedures are followed and that accounting records are maintained in a form which meets the requirements of the NFA's internal management, of the monitoring arrangements agreed with the Home Office and of the NFA's formal accounts
 - Appointing the internal auditors and commissioning value for money audits in consultation with the Principal Accounting Officer
 - Negotiating with the Treasury on NFA end year flexibility as part of the arrangements co-ordinated by the Home Office.

Management Board

- 17. The Chief Executive is supported and guided by the NFA Management Board. The members of the NFA Management Board are:
 - The Chief Executive who will normally chair the Management Board
 - A representative of the Home Office sponsor
 - The Non-Executive Directors of the NFA
 - The Directors of the NFA
 - The senior finance professional, where this function is not fulfilled by an NFA Director.
- 18. The Chief Executive may invite others to attend Management Board meetings.
- 19. Together the Chief Executive and the Management Board will:
 - Ensure that risks to the NFA's objectives are actively identified and addressed

- Agree an appropriate performance monitoring framework for the NFA
- Develop an annual business plan
- Agree NFA corporate policies (e.g. employment policies).
- 20. The Management Board will:
 - Receive and review reports of the effectiveness of internal and budgetary controls
 - Identify, track and communicate the delivery of the NFA's objectives within the framework defined by Ministers
 - Diagnose, track and manage the strategic gaps, risks and dependencies.
- 21. The Management Board, in conjunction with the Chief Executive, will also provide the Home Secretary with a summary of the NFA's performance, information on strategic risks and dependencies, and advice on key decisions and choices that flow from these.

Non-Executive Directors

- 22. The NFA has two Non-Executive Directors, appointed by the Home Office, whose role is to:
 - Provide external advice and expertise, in association with independence of thought, to inform NFA decision making processes
 - Offer independent constructive challenge to the operation of the Management Board, thus contributing towards the Board's purpose
 - Provide support and advice to the Chief Executive and other Directors of the NFA
 - Serve on the NFA's Audit Committee
 - Advise the sponsor on the performance of the Chief Executive and of the NFA.

Research, Development and Statistics

23. The Chief Scientific Adviser to the Home Office has overall responsibility for the quality of the science conducted in the Home Office, including social science. The NFA will seek appropriate advice and support from the Chief Scientific Adviser.

Policy

- 24. The Home Secretary sets the policy, strategic and resource frameworks within which the NFA discharges its responsibilities to lead and co-ordinate activity to reduce fraud.
- 25. The NFA will work closely with the Home Office to ensure that its work is aligned with the Government's wider policy agenda, including the National Cyber Security Programme led by the Cabinet Office.
- 26. The Chief Executive has the right to give independent advice to the Home Secretary if, in his view, policy proposals are unaffordable or operationally risky and undeliverable.

Relationship with Parliament, key delivery partners and other bodies

Parliament

- 27. The Home Secretary is accountable to Parliament for all matters concerning the NFA. Where members of Parliament wish to raise a matter on the NFA's day-to-day functions, they are encouraged to write to the Chief Executive. The Chief Executive will ensure that any matter on which it is proper for the Home Secretary to reply in the first instance is referred to the Home Secretary without delay. Ministers may ask the Chief Executive for advice in replying to Parliamentary Questions, to write to MPs in response to written Parliamentary Questions and to reply to individual letters on matters for which the Chief Executive is responsible. Letters in reply to Parliamentary Questions are published in the Official Report.
- 28. The Principal Accounting Officer and the Chief Executive (as the NFA Accounting Officer) are liable to be summoned to appear before the Committee of Public Accounts. The Home Secretary decides who should represent her at other Parliamentary Select Committees when affairs of the NFA are discussed. In practice where a Committee's interest is in the day-to-day functions of the NFA, the normal presumption will be that the Chief Executive will be the person best able to answer on the Minister's behalf.
- 29. The NFA will deal with official correspondence and other enquiries according to procedures set out in Cabinet Office guidance: 'Guidance on handling government correspondence'.
- 30. The NFA recognises the authority of the Parliamentary Commissioner for Administration.

Key delivery partners

31. The NFA works with a wide range of key partners across the public, private and voluntary sectors and with law enforcement and regulators. It may also contract out the operation of some of its functions. The Chief Executive will ensure that effective working relationships are maintained by the NFA including consulting widely with delivery partners across all sectors (public, private, voluntary, law enforcement and regulators) on the NFA's plans and performance.

Other government departments and local authorities

32. The NFA will work with other government departments and local authorities as

required to enable it to discharge its responsibilities to lead and co-ordinate activity to reduce fraud and to ensure that the NFA helps to deliver their policy agendas as appropriate.

The devolved administrations

33. The NFA will consult and work with the devolved administrations as appropriate. The Home Office will be consulted on the nature of the engagement and joint working with the devolved administrations and organisations which are accountable to the devolved administrations.

Planning and performance

- 34. The NFA's planning and performance management arrangements will:
 - Identify at a high level how the NFA's objectives will be achieved and the estimated cost of delivering them efficiently
 - Contain performance indicators and milestones
 - Adhere to delegated budgets and indicative allocations by the Home Office and other funders and be consistent with the resources allocated to the NFA
 - Ensure that the Chief Executive and the Directors of the NFA are held to account for the delivery of particular objectives
 - Ensure that consistent, accurate and timely information is available to Ministers and the Home Office to support effective planning, performance and risk management
 - Comply with the Department's policies and practices for the appraisal and approval of investments.

Business Plan

- 35. The Chief Executive will submit the NFA's Business Plan for approval by the Home Secretary in draft prior to the start of the financial year to which it applies. This will set out the plans for the forthcoming financial year related to its specific objectives, performance indicators and milestones. It is a key document against which the NFA's performance is measured. The plan will include:
 - Priorities and work programme for the year
 - Key assumptions on workload and the resources available
 - Milestone targets for achievement and any supporting performance indicators.
- 36. Where other government departments have interests which are affected by the NFA's business plan, the NFA and the Home Office will ensure that officials and Ministers in other departments are consulted as appropriate.
- 37. The NFA's Business Plan will be published.
- 38. If there are major unforeseen changes to the NFA operating assumptions then the plan may need to be revised during the course of the financial year. The Chief Executive will submit proposed changes to the plans to the Home Secretary.

Measurement and Monitoring

39. The Home Secretary will agree a set of performance indicators for the NFA. The Chief Executive will provide regular progress and performance reports to the Home Office and publish an annual report, the contents of which will be agreed by the Home Secretary. The Chief Executive will also publish regular performance reports to inform the NFA's partners on its progress and achievements.

Financial management

40. The NFA is subject to the normal timetables and other requirements of the spending review, estimates, cash limits and other controls, and Vote Accounting Procedures. It is subject to net running cost control on the Home Office's Vote. It also produces Annual Reports and Accounts on an accruals basis, which are also consolidated into the Home Office's Annual Report and Account.

Financial Delegations

- 41. The Chief Executive exercises financial authorities in accordance with his delegation letter and the principles and specific guidance set out in Chapter 4 of "Managing Public Money". The Chief Executive has full authority within the relevant Vote allocations to approve all items of expenditure, use receipts, let contracts, write off losses and make special payments which are consistent with the NFA's functions and business plan, subject to not exceeding the appropriate Estimate Request for Resources limit.
- 42. The Chief Executive will follow the guidance on the treatment of losses and special payments set out in Chapter 4 of "Managing Public Money" and the Home Office Finance Manual. The Chief Executive is delegated a limit to authorise the write off of losses and make special payments which he will not exceed in any one instance. All claims of a value exceeding these limits should be referred to Home Office Finance.
- 43. Prior to the commencement of each year, the Principal Accounting Officer will write to the Chief Executive setting out the Chief Executive's financial responsibilities and delegating expenditure limits in terms of near-cash Resource, non-cash Resource and Capital for that year.
- 44. The Chief Executive may delegate to his staff authority to purchase goods and services including personnel, pay invoices and use receipts, as far as considered necessary, within the needs for financial control and propriety. Funding may be allocated as formal budgets to his staff who will be personally responsible for ensuring that their expenditure is consistent with NFA policies. Delegated authorities will be clearly defined in financial guidance or equivalent instructions and will be consistent with the rules of Government Accounting and the internal accounting policies laid down by the Chief Executive.

Annual Report and Accounts

45. As Accounting Officer, the Chief Executive prepares an Annual Report and

Accounts that are subject to audit. This sets out the NFA's performance against the objectives, milestones and key performance indicators published in that year's Business Plan. It includes:

- A review of the NFA's activities during the year
- Performance against objectives, milestones and performance indicators set out in the NFA Business Plan
- The NFA's financial position
- The NFA's Governance Statement
- Any additional information the Home Secretary may, from time to time specify.
- 46. The Annual Report and Accounts includes a set of annual financial accounts on an accruals basis. The accounts are produced in accordance with a direction issued by HM Treasury under section 7 of the Government Resources and Accounts Act 2000 and are audited by the Comptroller and Auditor General. Information on performance against objectives, milestones and key performance indicators is also included in the notes to the accounts. This information is within the scope of the Comptroller and Auditor General's audit. Following the Home Secretary's approval, the Annual Report and Accounts are published and laid before both Houses of Parliament, normally before the summer recess. The aim should be for this to take place in a timeframe that allows the Home Office to publish Consolidated Resource Accounts before the start of summer recess in the financial year following the year to which it relates. The timing of publication must be agreed with the Accounting and Finance Unit of the Home Office.

Audit Committee

47. The Chief Executive in his role as Accounting Officer and the NFA's Management Board is supported by an independent Audit Committee, established as a committee of the Management Board, in accordance with Government Accounting and the Cabinet Office and Treasury Guidance. The Audit Committee is chaired by one of the NFA's Non-Executive Directors. Its membership and functions are in accordance with the Cabinet Office Guidance on codes of practice for Board Members of Public Bodies and the Treasury's Audit Committee Handbook.

48. The Audit Committee:

 Supports and advises the Chief Executive and the Management Board in discharging their respective responsibilities for issues of risk management, control and governance by reviewing the comprehensiveness, reliability and integrity of assurances provided to the Chief Executive and the Management Board

- Examines strategic processes for risk management, control and governance and the Governance Statement; the accounting policies, the accounts, and the annual report of the NFA, including the process for review of the accounts prior to submission for audit, levels of error identified, and management's letter of representation to the external auditors
- Considers planned activity and results of both internal and external audit
- Reviews the adequacy of management response to issues identified by audit activity
- Scrutinises assurances relating to the corporate governance requirements for the organisation
- Where appropriate, reviews proposals for tendering for internal audit services or for purchase of non-audit services from contractors who provide audit services
- Where appropriate, considers the impact on the operation of the NFA of any
 programmes or projects being undertaken by the Home Office or any other
 organisation (whether in conjunction with the NFA or not) which affects the
 ability of the Chief Executive or the Management Board to discharge their
 responsibilities for risk management, control and governance
- Considers the outcome of investigations on any matter brought to its attention, within the scope of its duties
- Reviews anti-fraud policies, whistle-blowing processes, and arrangements for special investigations.
- 49. The Audit Committee will also periodically review its own effectiveness and report the results of that review to the Management Board and the Chair of the Home Office Corporate Audit Committee.
- 50. The Chair of the NFA Audit Committee will maintain effective communication arrangements with the Home Office Corporate Audit Committee on governance, control and risk management arrangements. This will include attending meetings between the Chairs of the audit committees within the Home Office family to discuss issues of mutual interest and making the NFA Audit Committee minutes available to the Home Office Audit Committee through the Audit Committee secretariat.

External Audit

51. The Comptroller and Auditor General audits the NFA's expenditure and income, examines their regularity and propriety and certifies and reports on the NFA's Statement of Accounts. The Comptroller and Auditor General sends copies of all management letters and correspondence relating to those letters to the member of the NFA Management Board designated as the NFA's senior finance professional. For the avoidance of doubt, this requirement does not apply to drafts of management letters. The Comptroller and Auditor General has access to the NFA's books and records by virtue of the National Audit Act 1983 for the purposes of carrying out examinations into the economy, efficiency and effectiveness with which the NFA has used its resources and discharged its functions.

Internal Audit

52. The Chief Executive is responsible for internal audit within the NFA, in accordance with the objectives and standards set out in the Government Internal Audit Manual.

Risk Management

53. The Chief Executive will establish and maintain comprehensive and proportionate risk management processes for the NFA to support the Governance Statement. The risk management processes will use Home Office best practice to identify, evaluate and control risks in a cost effective way and, at an early stage, escalate to the Management Board any which might have a significant impact on the NFA. The Chief Executive will maintain the NFA risk management plan, which will be available to the Home Office.

People

Recruitment and Terms and Conditions of Service

- 54. The NFA will recruit permanent staff to all grades normally through open competition in accordance with the Civil Service Commissioners' recruitment principles and any extant guidance on civil service recruitment from the Cabinet Office.
- 55. The NFA's employees will be civil servants subject to Civil Service terms and conditions of service, except where otherwise agreed with the Home Office, the Treasury and Cabinet Office in the interests of the efficient and effective management of the NFA. Employees will be offered the opportunity to join one of the Civil Service Pension Schemes.

The Chief Executive

56. The Chief Executive will normally be appointed following recruitment through open competition. The pay and terms and conditions of employment of the Chief Executive will be set by the Home Office Sponsor, in consultation where necessary with the Cabinet Office.

Human Resources Management

- 57. The Chief Executive will be responsible for determining the number and skills of staff employed in the NFA, their deployment and their terms and conditions.
- 58. The Chief Executive may review the terms and conditions of service in the interests of improving the effectiveness and efficiency of the NFA. Proposed changes to the terms and conditions of service must be agreed by the Home Secretary and will be subject to consultation with the staff and, where appropriate, the Treasury and the Cabinet Office.
- 59. The NFA will have delegated responsibility, within the resources approved by Parliament and subject to public sector pay policy and an agreed annual pay remit, to pay salary levels which are appropriate to recruit, motivate and retain staff with the necessary skills and experience required to meet its objectives.

Health and Safety

60. The Chief Executive will be responsible for ensuring that the NFA is fully

compliant with all Health and Safety Legislation. Some of this responsibility may be discharged via use of Home Office Shared Services.

Performance Management

61. The NFA will conduct regular staff performance reviews and will provide guidance and training for all NFA staff on the performance management system.

Equality & Diversity

62. The Chief Executive will be responsible for ensuring that the NFA promotes equality of opportunity for all staff and applicants for employment as well as respecting diversity and difference.

Employee Relations

63. The Chief Executive will be responsible for promoting good employee relations and for consultation, when appropriate, with staff.

Provision of shared corporate services for the NFA by the Home Office or other departments

- 64. In order to ensure best value for money and consistency across the Home Office, the Chief Executive may enter into agreements with the Home Office or other departments to provide corporate services which in his view it is neither efficient nor effective for the NFA to deliver itself.
- Office undertook to provide the NFA with a range of Shared Services, including financial, procurement and HR processing (known collectively as Adelphi Services), the services of a 'senior finance professional', security, property, IT, legal, internal audit, press office and an internal counter fraud service. The Home Office undertook to meet any additional costs incurred by the NFA in using these services, subject to an assessment of the general efficient and effective running of the NFA.
- 66. The general principles governing the provision of Shared Services to the NFA are as follows:
 - The Home Office Supervisory Board will ensure as far as possible that Departmental Shared Services meet the needs of the NFA
 - The NFA will adhere to the principles set out in the Home Office Departmental Framework for Shared Services
 - The NFA will be able to participate in cross-agency arrangements for determining customer priorities and business needs, and for managing the delivery of services. The service provision management and governance arrangements will be developed in collaboration with the NFA and other Home Office organisations
 - The NFA and Home Office Shared Services will develop two-way Service-Level Agreements (SLAs) and Memoranda of Understanding (MOUs), covering service provision and associated funding arrangements. They will also agree arrangements for the management of performance, escalation and the approach to dispute resolution. Such agreements shall have the same service standards for Home Office Headquarters where it firstly makes business sense to do so and secondly does not cause disproportionate costs for the NFA
 - The NFA will use Shared Services unless the Chief Executive seeks an exception via the Home Office Supervisory Board. The case for divergence from Home Office strategy must be well set out (including an assessment of the impact on forecast efficiencies across the Department and existing

- programmes) before authorisation will be given to secure appropriate alternative provision
- In securing any corporate services independent of Home Office Shared Services and the wider Home Office, the NFA will consult its Home Office Sponsor and the Shared Services Directorate and give full regard to wider interests of the Department and the need to ensure compatibility, standardisation, efficiency of systems, the exploiting of existing assets and collective buying opportunities.

Communications

- 67. The NFA will retain its own capability to deliver internal communication, external reputation management, partner and stakeholder engagement and communications with victims and potential victims of fraud.
- 68. Home Office press office will see NFA submissions to Ministers in draft and provide media handling advice where necessary. The NFA will use the Home Office press office for all media engagement unless specific alternative arrangements are agreed on a case-by-case basis. Press officers working on NFA issues will provide regular reports to the Chief Executive or persons nominated by him.

Security

- 69. The Permanent Secretary has overall responsibility for security in the Home Office. The Chief Executive is accountable to the Permanent Secretary for all aspects of security related to the management of the NFA. The majority of the day to day oversight and assurance functions of security in the Home Office are delegated by the Permanent Secretary to the Home Office Senior Information Risk Owner (SIRO) and the Departmental Security Officer (DSO). These functions include ensuring that the Home Office develops security policies and practices that are consistent with, and amplify as necessary, the overarching Government Security Policy Framework produced by the Cabinet Office.
- 70. The Chief Executive is responsible for developing a robust and effective range of security measures in order to protect NFA people, premises, information and assets making use of Home Office Shared Services where appropriate (for example premises security). These measures will be in line with Cabinet Office Security Policy Framework. In order to facilitate the effective development, implementation and oversight of security policies and practices in the NFA, the Chief Executive will nominate a Senior Information Risk Owner to provide a dedicated focus between the NFA and the Home Office. The responsibility for the day to day management of NFA security risk management activities (which includes information and reputational

risks) will rest with nominated NFA officials.

- 71. The Home Office will provide the NFA with such advice and guidance as appropriate in order to reflect the wider needs of the Home Office, the levels of security compliance required and where additional supplementary security policies may be necessary. The Home Office DSO provides advice and guidance on all aspects of security within the Home Office for the physical security of buildings, vetting for all NFA staff and the accreditation of all IT systems holding protectively marked material.
- 72. The Chief Executive is responsible for ensuring that the Home Office Departmental Security Unit (DSU) Vetting Team, under the control and direction of the Home Office DSO, is closely involved in the provision of vetting services for all NFA staff. The Chief Executive is responsible for ensuring that only properly cleared and/or authorised people have access to the NFA's assets. The Chief Executive and the Home Office DSO share responsibility for ensuring that only properly cleared and/or authorised people have access to the premises occupied by the NFA.
- 73. On physical security, the Home Office DSO is responsible for the development of risk management plans and procedures for the protection of NFA staff and the premises occupied by the NFA. The Chief Executive and the Home Office DSO share responsibility for the protection of the NFA's documents and assets. Such arrangements will be implemented in accordance with security framework provisions and, where deemed appropriate, in line with wider Home Office policy as directed by the Home Office DSO.

Information Management and Assurance

- 74. The NFA will manage its information in a manner which conforms to the Home Office Information Systems and Technology strategy and Departmental policies on information management, security, risk management and information assurance. The NFA will appoint a Senior Information Risk Owner (SIRO) with responsibilities delegated by the Home Office SIRO for the overall appropriate handling of the NFA's information.
- 75. The NFA will identify all its information assets, including those managed on its behalf by third parties, and appoint an appropriate Information Asset Owner with personal responsibility for each asset. The NFA will also ensure that all staff who handle sensitive data, including those employed by organisations providing relevant services for the NFA, are trained in accordance with Home Office and Government requirements.
- 76. The Chief Executive is responsible for day to day management of Information Assurance (IA) activities in the NFA. The Home Office DSO, through the Head of IA, will provide such oversight, advice and assurance as appropriate.

- 77. The Chief Executive is responsible for the development of business continuity arrangements and plans for the NFA. The NFA's plans should take into account wider Home Office considerations, the feasibility of shared facilities, resources and processes to better manage adverse consequences, best practice transfer and the effective continuity of government business.
- 78. The NFA's SIRO will work with the Home Office SIRO to provide whatever regular security assessments of the NFA to the Permanent Secretary she requires in order to provide an assurance that the broader Home Office security posture is adequate. This will be managed through the Information Assurance Maturity Model assessment process run through Cabinet Office.
- 79. The Home Office SIRO is responsible to the Permanent Secretary for information Risk Management and will act on behalf of the NFA in dealings with the Cabinet Office and other central bodies on strategic matters relating to information risk and assurance. The NFA has appointed a SIRO whose delegated authority and responsibilities will be agreed with the Home Office SIRO.
- 80. The Chief Executive is responsible for ensuring that measures are in place in the NFA to meet emerging and operational level security and data handling issues. Where there is a risk that a compromise of information in the NFA could have wider Home Office consequences, the Chief Executive must ensure the Home Office SIRO is informed immediately.
- 81. The Chief Executive is responsible for the development of appropriate mechanisms in the NFA for the management of official and personal information and, in particular, where that information carries a significant degree of risk (including reputational risk) should it be lost, stolen and/or otherwise compromised.

Review, amendment and publication of the framework document

Document Review

82. The Home Secretary in consultation with the Chief Executive and the Management Board will review this Framework Document at intervals of not more than three years.

Amendments

83. The Home Secretary and the Chief Executive may at any time propose amendments to the Framework Document that they regard as desirable.

Publication

84. This Framework Document and any subsequent amendments or supplements will be placed in the Libraries of the Houses of Parliament and published on the NFA pages of the Home Office website.