Audit Committee

29 February 2016



Counter Fraud and Corruption Policy and Fraud Response Plan

Report of Chief Internal Auditor and Corporate Fraud Manager

Purpose of the Report

1. To request that the Audit Committee review and approve the revised Counter Fraud and Corruption Policy and the Council's Fraud Response Plan. The updates to the policy and plan will ensure they are fit for purpose and reflect current legislation as well as being fully aligned to all other Council policies.

Background

- 2. The current Counter Fraud and Corruption Strategy was last reviewed in May 2014 and the Fraud Response Plan was last reviewed in January 2010. The proposed amendments take into account the latest CIPFA guidance "Managing the Risk of Fraud" and the provisions of the Bribery Act 2010 which came into effect in 2011.
- 3. The revised Counter Fraud and Corruption Strategy is attached as Appendix 2 and the Fraud Response Plan is attached as Appendix 3.
- 4. In order that all employees are aware of the policy and the response plan's content the intention is that the policy is communicated to all employees through 'Buzz Magazine' and other appropriate channels. Discussions have been held with the Internal Communications Manager with formal communications to begin at the end of March following approval of the policy.

Key Points

5. The Counter Fraud and Corruption Strategy is designed to prevent, detect and deter fraud and corruption and sets out what action will be taken against any attempted or actual fraudulent acts affecting the Council. It highlights the benefit of having effective internal controls and the role of the Internal Audit Service and joint working with other organisations and agencies in the approach to tackling fraud and corruption.

- 6. The Strategy also sets out the Council's responsibilities for employees, councillors and other stakeholders in the prevention, deterrence and detection of bribery which is one of the most common forms of corruption. An important part of complying with the Bribery Act is for organisations to demonstrate robust anti-bribery policies and procedures and this strategy forms an overarching part of that approach.
- 7. The purpose of the fraud response plan is to provide guidance to employees and managers on the procedures that must be followed to define authority levels, responsibilities for action and reporting lines in the event of suspected fraud, theft or other irregularity.
- 8. Both documents include methods of reporting suspicions or concerns and, subject to approval, will be published on the Council's intranet and internet.

Recommendation

 Audit Committee approve the revised Counter Fraud and Corruption Strategy and the Fraud Response Plan attached at Appendix 2 and 3 respectively.

Contact:

Paul Bradley, Chief Internal Auditor and Corporate Fraud Manager

Tel: 03000 269645

Appendix 1: Implications Finance No direct implications as a result of this report. **Staffing** None Risk None **Equality and Diversity/Public Sector Equality Duty** None **Accommodation** None Crime and disorder None. **Human rights** None Consultation All Corporate Directors have been consulted. **Procurement** None **Disability Discrimination Act** None **Legal Implications** None