

<b>Report to:</b>	Audit and Governance Committee
<b>Lead Cabinet Member:</b>	John Williams
<b>Lead Officer:</b>	Peter Maddock
<b>Date:</b>	29 March 2022

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# Anti-Theft, Fraud, Bribery and Corruption Policy

## Executive Summary

1. The Council has reviewed its Anti-Theft, Fraud, Bribery and Corruption Policy; intended to set out its approach to:
  - Protect Council assets from exposure to the risk of theft, fraud, bribery and Corruption and provide assurance that reports will be taken seriously and investigated thoroughly.
  - Provide Corporate Guidance on how to raise concerns and signpost colleagues to reporting platforms.
  - Identify responsibilities and reporting chains.
  - Warn of the potential consequences for perpetrators and highlight those policies and processes within the business which may interact with this report.

## Recommendations

2. It is recommended that the Audit and Governance Committee adopt the Corporate Fraud Policy; acknowledging the governing body's responsibility for ensuring that risks associated with fraud, theft, bribery and corruption are managed effectively across all parts of the organisation.

## Reasons for Recommendation

3. The Corporate Fraud Team was set up in 2020 to align internal investigatory services and to identify, disrupt, prevent and detect fraud across the business. The policy sets the framework within which the Council will operate to ensure that reports of insider fraud are reported to the appropriate person and investigated.

## **Details**

4. This is a revised document and the Audit and Corporate Governance Committee in its terms of reference has a duty to monitor progress against the policy.
5. The Policy itself is attached at Appendix A.

## **Options**

6. To adopt the Policy acknowledging the Council's commitment to protect assets from abuse both insider and external.
7. To adopt the Policy acknowledging the Council's commitment to protect assets from abuse both insider and external with agreed amendments.
8. To reject the Policy.

## **Alignment with Council Priorities**

### **Growing Local Business and economies**

9. Fraud and error limits resources available to support growth and the local economy. Where funds or resources are diverted away from those that need them the most it causes loss and disadvantage to those in genuine need.

### **Financial**

10. Fraud and error can have a significant financial impact upon resources and misdirect resources from those in genuine need. It is recognised that maintaining resilience to fraud and corruption is a priority within the business plan to protect limited resources.

### **Risks/Opportunities**

11. Failure to agree a fraud Policy will undermine:
  - Leadership Team's commitment to acknowledge the threat of fraud and corruption and the harm they can cause to an organisation, its aims and objectives and to its service users.
  - The Council's vision to create a culture that is resilient to the threats of fraud and corruption and align to the principals of good governance.
  - The Council's commitment to provide value for money, exploring opportunities for financial savings from enhanced fraud detection and prevention.

## **Equality and Diversity**

12. Commitment to equity to ensure insider reports are dealt with as robustly as external reports.

## **Alignment with Council Priority Areas**

### **Housing that is truly affordable for everyone to live in**

13. Tenancy Fraud is categorised as a major risk facing all Local Authorities. By protecting assets from abuse those properties that are misdirected can be recovered and put back into the council stock.

## **Background Papers**

Fighting Fraud and Corruption Locally Strategy 2020  
[Fighting Fraud Corruption Locally Strategy 2020 | Cifas](#)

Insider Threat  
[Fraudscape 2021 - Cifas](#)

## **Appendices**

Appendix A: Anti-Theft, Fraud, Bribery and Corruption Policy

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