

## Appendix A

### Summary of proposed amendments to Anti-Theft, -Fraud and -Corruption Policy

<b>Source and reason for proposed amendment</b>	<b>Proposed amendment</b>
The newly appointed Executive Director (Corporate Services) is the manager responsible for dealing with matters of theft, fraud and corruption, through statutory “section 151” responsibilities.	The wording of paragraphs 2.1 and 5.1 have been amended to reflect this.
<u>Recommendation from Internal Audit (IA) review of Anti-Theft, -Fraud and -Corruption (ATFC) Policy</u> It is recommended that the ATFC Policy is revised to include a concise list of all interlinked policies.	Included as new Annex C, referred to in paragraph 2.4.
<u>Recommendation from IA review of ATFC Policy</u> It is recommended that the ATFC Policy, in accordance with good practice, is reviewed on an annual basis.	Included as new paragraph 2.6
<u>Recommendation from IA review of ATFC Policy</u> It is recommended that SCDC consider the relevance of the inclusion of the Section 10, Housing Benefit and Council Tax Benefit Fraud in an ATFC Policy. If this section is to remain in the policy, it is recommended that consideration is given this being held as an Appendix to the ATFC Policy. [Note: This was included in the ATFC Policy in response to a previous IA recommendation. Housing or council tax benefit is the most likely area of fraud the Council faces. We therefore consider it important to note within the overall ATFC Policy that there are specific anti-fraud procedures to follow in this area.]	Moved to new Annex D, referred to in paragraph 2.7.
<u>Recommendation from IA review of ATFC Policy</u> It is recommended that South Cambridgeshire District Council (SCDC) consider inclusion of the definitions of the Fraud Act, as an explanation of their meaning will assist in providing the reader of the Anti-Theft, Fraud & Corruption (ATFC) Policy with an improved understanding of what constitutes Fraud, Theft and Corruption.	Included as new Section 4.
The Council’s Monitoring Officer should be the person with whom Members raise concerns.	The wording of paragraph 5.2 has been amended to reflect this.

<b>Source and reason for proposed amendment</b>	<b>Proposed amendment</b>
<p><u>Recommendation from IA review of ATFC Policy</u> It is recommended that Section 4 of the ATFC Policy should clearly state that employees of SCDC should not contact the police if they have any concerns regarding Theft, Fraud or Corruption but this is a course of action that the Council will decide upon and that employees should only address their concerns to those indicated within the policy.</p>	<p>Included as new paragraph 5.3</p>
<p><u>Recommendation from IA review of ATFC Policy</u> It is recommended that Section 4, ATFC Policy is revised to include details of the Whistleblowing Policy and that this revision provides guidance for anonymous reporting and the contact details of Public Concern at Work. Public Concern at Work is a Whistleblowing Charity who offer free, confidential advice to people concerned about crime, danger or wrongdoing at work.</p>	<p>Included as new paragraph 5.6. (Note: The guidance recommended is not included in this new paragraph, as this would duplicate the Whistleblowing Policy - but it is clearly referenced.)</p>
<p>Contract Standing Orders were re-titled Contract Regulations when they were last reviewed.</p>	<p>The wording of paragraphs 6.3, 6.5, 7.1 and 8.1 have been amended to reflect this.</p>
<p><u>Recommendation from IA review of Counter Fraud Arrangements</u> SCDC must ensure that Internal Audit is notified in all instances where fraud is suspected in accordance with the ATFC Policy. To further ensure compliance with the ATFC policy, SCDC must ensure that the ATFC policy is revised to reflect that the Benefit Fraud Manager can undertake corporate fraud investigations.</p>	<p>Included as new paragraph 9.3 and paragraph 9.4 amended to include reference to the Fraud Manager.</p>
<p>With the recent departure of the Head of Revenues, the Benefits Manager has line management responsibility for the benefit fraud team.</p>	<p>The wording of Annex D, paragraphs 6 and 13, have been amended to reflect this.</p>
<p>The Finance and Staffing Portfolio Holder is the Member to whom reports of the Council's performance in respect of housing and council tax benefit fraud should be made.</p>	<p>The wording of Annex D, paragraph 13 has been amended to reflect this.</p>