



REPORT TO: POLICY AND RESOURCES COMMITTEE ON 14 JANUARY 2020

SUBJECT: POLICY TO COMBAT FRAUD, THEFT, BRIBERY AND CORRUPTION

BY: DEPUTE CHIEF EXECUTIVE (EDUCATION, COMMUNITIES AND ORGANISATIONAL DEVELOPMENT)

1. REASON FOR REPORT

- 1.1 To seek committee approval of an updated policy to combat fraud, theft bribery and corruption.
- 1.2 This report is submitted to Committee in terms of Section III (B) (2) of the Council's Scheme of Administration relating to preparing and reviewing from time to time such rules as may be necessary for the proper administration of the Council's financial affairs.

2. RECOMMENDATION

- 2.1 **It is recommended that the Policy and Resources Committee considers and approves the updated fraud etc. policy provided as Appendix 1 to this report, subject to consultation with the Trade Unions.**

3. BACKGROUND

- 3.1 The council has a long established policy to combat fraud, theft, bribery and corruption which affirms a zero tolerance to such behaviours.
- 3.2 The policy was last updated in 2012 following the coming into force of the Bribery Act 2010. The principles of the policy have remained broadly unchanged in the intervening period with the council seeking to maintain a culture that encourages high standards of conduct, as well as developing appropriate systems for prevention, detection and investigation of irregular practice.
- 3.3 The Audit and Scrutiny Committee at its meeting on 13 November 2019 (para 5 of the minute refers) considered the draft policy as at **Appendix 1**. This formed part of a wider review of good governance arrangements outlined in a recent Accounts Commission paper entitled 'Safeguarding Public Money: are you getting it right?' The Committee recommended that the policy be updated

on a triennial basis but otherwise offered no comments on the proposed revisions. These revisions in the main refer to changes in liaison arrangements with the Department for Work and Pensions for the investigation of benefits fraud and to details of the activities of the council's Integrity Group.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

No direct implications.

(b) Policy and Legal

The policy to combat fraud etc. affirms the council's commitment to ensuring the proper use of public funds, to maintaining systems that mitigate the risk of their misuse, and to investigating any incidents where practices adopted fall short of those expected.

(c) Financial implications

The policy supports the proper use of financial resources.

(d) Risk Implications

While the policy itself will not prevent fraud, it gives a clear statement of intent around the council's expectations in this regard and as such may have a deterrent effect that reduces the risk of inappropriate behaviours taking place.

(e) Staffing Implications

No direct implications.

(f) Property

No direct implications.

(g) Equalities/Socio Economic Impact

No direct implications.

(h) Consultations

The Chief Financial Officer and the Monitoring Officer have been consulted and are in agreement with the report where it relates to their area of responsibility.

As this policy in part relates to the workforce, consultation with the trade unions will be required. It is proposed that any changes of wording are delegated to the Depute Chief Executive (EC&OD) for implementation. Should there be significant changes of substance recommended following consultation with the trade unions, these would be referred to committee for consideration.

5. CONCLUSION

- 5.1 The Policy to Combat Fraud, Theft, Bribery and Corruption has been updated in support of good governance practice and is submitted for approval by the Policy and Resources Committee, subject to consultation with the trade unions.**

Author of Report: Atholl Scott, Internal Audit Manager
Background Papers: There are no background papers
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