

OVERVIEW SCRUTINY AND AUDIT COMMITTEE

7 FEBRUARY 2012

HEAD OF WELLAND INTERNAL AUDIT CONSORTIUM

REVISED COUNTER FRAUD STRATEGY

1.0 PURPOSE OF REPORT

- 1.1 The purpose of the report is to provide Members with the opportunity to review and comment on the Council's revised Counter Fraud Strategy, including the Whistleblowing Policy and Anti-Bribery Policy.

2.0 RECOMMENDATIONS

- 2.1 **It is recommended that the revised Counter Fraud Strategy and associated documents be endorsed for Council approval.**
- 2.2 **It is recommended that the Monitoring Officer, in consultation with the Head of Consortium, receives delegated authority to amend the Counter Fraud Strategy and associated documents once the impact of the Localism Act and regulations have been fully understood.**

3.0 THE COUNTER FRAUD STRATEGY AND ASSOCIATED DOCUMENTS

- 3.1 The Council's current Counter Fraud Strategy is dated 2009. There is a requirement to update the Counter Fraud Strategy on a periodic basis; the responsibility for which has been allocated to the Welland Internal Audit Consortium.
- 3.2 The Counter Fraud Strategy, which can be found at Appendix A, describes the Council's arrangements to discourage or detect improper behaviour, whilst also identifying opportunities to enhance and strengthen them. An Internal Audit review undertaken in year has provided assurance that the Council's current arrangements are fit for purpose. However action points within the Strategy have been designed, and allocated to the Council's Management Team, to strengthen the existing arrangements. The Council's Anti-Fraud Policy has been subsumed within the Strategy to avoid duplication and possible confusion. The Fraud Response Plan previously approved in 2009 has been modified so that it is consistent with the Strategy.
- 3.3 Should the revised Counter Fraud Strategy be accepted, the Consortium has developed an e-learning tool which will be rolled out to all employees to provide the Council with further assurance that the counter fraud arrangements are widely understood and accepted.
- 3.4 As part of the review, the Consortium was also commissioned to revise the Whistleblowing Policy and to devise an Anti-Bribery Policy following new legislation. The Whistleblowing Policy was last revised in 2009 and still remains fit for purpose, save some minor amendments following the Council's restructure. The revised Policy can be found at Appendix A.
- 3.5 The Anti-Bribery Policy, Appendix A, was devised following the publication of the Bribery Act, which came into force on the 1st July 2011. The Bribery Act made it an offence to offer, promise or give a bribe (section 1) and to request, agree to receive, or accept a bribe (section 2). The devised Anti-Bribery Policy has been developed in line with the CIPFA's best guidance policy and provides a consistent framework to enable the Council's employees and those dealing with the Council to understand and implement arrangements enabling compliance with the Bribery Act.

4.0 POLICY AND CORPORATE IMPLICATIONS

4.1 The adoption of the revised Strategy and associated documents would enhance the Council's overall governance arrangements.

5.0 FINANCIAL AND OTHER RESOURCE IMPLICATIONS

5.1 There are no financial or other resource implications directly arising from this report

6.0 LEGAL IMPLICATIONS/POWERS

6.1 There are no legal implications directly arising from this report

7.0 COMMUNITY SAFETY

7.1 There are no community safety issues directly arising from this report

8.0 EQUALITIES

8.1 The Strategy and associated documents have been subject to an Equalities Impact Assessment, with support from the Council's Equalities and Diversity Officer. The Assessment identified the need to ensure that the Strategy and associated documents meet individual needs with regard to communication and language. Should any accessibility issues arise reasonable adjustments would be made.

9.0 RISKS

9.1 The adoption of the Strategy and associated documents would mitigate the Council's exposure to risks of fraud or corruption.

10.0 CLIMATE CHANGE

10.1 There are no climate change issues directly arising from this report.

11.0 CONSULTATION

11.1 The revised Strategy and associated documents have been subject to consultation with the Council's Management Team.

12.0 WARDS AFFECTED

12.1 All wards are indirectly affected.

Contact Officer Natasha Bailey, Acting Lead Internal Auditor
Date: 18th January 2012

Appendices : One

Background Papers: None

Reference :