

Part 10

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MELTON BOROUGH COUNCIL

Whistleblowing Policy

2015

Date of review due 2018

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1. Introduction

Whistle blowing is when a worker reports suspected wrongdoing at work. Officially this is known as making a disclosure in the public interest.

The Government introduced the Public Interest Disclosure Act in 1998 (PIDA) which provides legal protection against detriment for workers who raise concerns in the public interest about a danger, risk, malpractice or wrongdoing in the workplace which affects others. To be protected the disclosure must be in the public interest, the worker must have reasonable belief that the information shows that one of the categories of wrong doing listed in the legislation has occurred or is likely to occur, and the concern must be made in the correct way. From June 2013 to qualify for protection under PIDA a disclosure should be in relation to a concern which is in the 'public interest'. The public interest means the public good, not what is of interest to the public, and not the private interests of the person raising the concern.

Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances it may initially seem easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the Council's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis. It may not always be possible to keep identities confidential due to legal requirements or other practical issues concerning an investigation but wherever possible and where the employee requests it confidentiality will be protected.

The Whistleblowing Policy makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This Policy is intended to encourage and enable employees to raise serious concerns within the Council rather than overlooking a problem or 'blowing the whistle' outside.

The Policy applies to all employees, volunteers and those contractors working for the Council on Council premises, for example, agency staff, builders or drivers. It also covers suppliers and those providing services under a contract with the Council in their own premises.

These procedures are in addition to the Council's complaints procedures and other statutory reporting procedures applying to some departments. You are responsible for making service users aware of the existence of these procedures. A copy of the policy will be available on the Council's website.

The Policy has been discussed with the relevant trade unions and has their support.

2. Aims and Scope of the Policy

The Policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about malpractice;
- provide avenues for you to raise those concerns and receive feedback on any action taken;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;

- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The Whistleblowing Policy is intended to cover qualifying disclosures under the Public Interest Disclosure Act 1998. These include:

Criminal offences

Failure to comply with legal obligations

Fraud and Corruption

Miscarriages of justice

Threats to health and safety of an individual

Damage to the environment or

A deliberate attempt to cover up any of the above.

Thus, any serious concerns that you have about any aspect of service provision or the conduct of employees or members of the Council or others acting on behalf of the Council can be reported under the Whistleblowing Policy. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Council subscribes to; or
- is against the Council's Financial Procedure Rules and policies; or
- falls below established standards of practice; or
- amounts to improper conduct.

3. Safeguards

The Council is committed to good practice and high standards and wants to be supportive of employees. It is safe and acceptable for employees or contractors to speak up if they have a whistleblowing concern.

The Council recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

4. Confidentiality

.For the reasons given in 1 above, it may not always be possible to keep your identity confidential, however

All concerns will be treated as far as possible in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness

5. Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Council.

In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

6. Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you. –

7. Vicarious liability

The Enterprise and Regulatory Reform act imposed a new personal liability on co workers who victimise or harass whistleblowers as well as vicarious liability on the part of their employers. The Council has a separate policy on vicarious liability; please see this for further details.

7. How to Raise a Concern

As a first step, you should normally raise concerns with your immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved, you should approach the Chief Executive or the Council's Monitoring Officer or the Head of the Welland Internal Audit Consortium.

Concerns may be raised verbally or in writing. Employees who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why you are particularly concerned about the situation

The earlier you express the concern the easier it is to take action.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

Advice and guidance on how to pursue matters of concern may be obtained from:

- the Chief Executive – Edd de Coverly - 01664 502536
- the Monitoring Officer – Keith Aubrey, Deputy Chief Executive – 01664 502530
- the Head of Welland Internal Audit Consortium - Rachel Ashley- Caunt,
Welland Internal Audit Consortium
Rutland County Council
Catmose, Oakham, Rutland, LE15 6HP

Mobile Number: 07824 537900

E-mail: rashley-caunt@rutland.gcsx.gov.uk

Website: www.rutland.gov.uk

- [External Auditor – Ernst Young](#)

You might also consider contacting Public Concern at Work, an independent whistleblowing charity that offers free, confidential advice to people concerned about crime, danger or wrongdoing at work.

Public Concern at Work – Contact Details	
Telephone	020 7404 6609
Email	UK enquiries: whistle@pcaw.co.uk UK helpline: helpline@pcaw.co.uk UK services: services@pcaw.co.uk
Website	www.pcaw.co.uk

You may invite your trade union representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

8. How the Council will respond

The Council will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary process;
- be referred to the police;
- be referred to the external auditor;
- form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Council will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, the person with whom you have raised the issue will write to you:

- acknowledging that the concern has been received;
- indicating how we propose to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made;
- supplying you with information on staff support mechanisms, and
- telling you whether further investigations will take place and if not, why not.

The amount of contact between the Officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Council will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend.

The Council will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Council will arrange for you to receive advice about the procedure.

The Council accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

9. The Responsible Officer

The Monitoring Officer has overall responsibility for the maintenance and operation of the Policy. She/he maintains a record of concerns raised and the outcomes and will report if necessary to the Council.

10. How the Matter can be taken further

The Policy is intended to provide you with an avenue within the Council to raise concerns. The Council hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Council, the following are possible contact points:

- the external auditor;
- your trade union;
- ;
- relevant professional bodies or regulatory organisations;
- the police

If you do take the matter outside the Council, you should ensure that you do not disclose confidential information.

12. Maintaining the Policy

The Policy will be reviewed by the Governance Committee on annual review with relevant legislation and good practice.



Counter Fraud & Corruption Policy

Adopted at Full Council

19 July 2017

Foreword

Melton Borough Council is committed to the highest standards of financial probity and takes its duty to protect the public funds it administers very seriously.

This is Melton Borough Council's Counter Fraud and Corruption Policy. It provides a clear framework for the Council to investigate suspected fraud thoroughly, to prosecute wherever the evidence supports such action and seek recovery of defrauded monies through all possible legal means.

The Council administers significant public funds and is sometimes targeted by persons wishing to defraud the public purse. This policy, and the structures maintained by the Council, demonstrate that we will make every effort to identify attempts to defraud the public purse and will robustly pursue individuals responsible.

The Council, through this policy, has adopted a zero tolerance towards fraud including:

- The referral of matters to the Police for investigation wherever appropriate and the full recovery of fraudulently obtained public funds by all legal means;
- The prosecution of persons responsible for defrauding the Council including prosecution through civil and criminal courts in the Council's own name or through the Police etc;
- The termination of contracts with partners and contractors; and
- The dismissal of employees proven to have defrauded or who have attempted to defraud the Council, including where an employee is complicit with another person's attempts to defraud the Council.

The Council requires all partners and contractors to assist in this role and cooperate with any fraud investigation undertaken by authorised officers.

Cllr Pat Cumbers
Governance Committee Chair

Lynn Aisbett
Chief Executive

1. INTRODUCTION

- 1.1 The authority aims to provide community leadership and quality services.
- 1.2 In carrying out its functions and responsibilities, the authority has always adopted a culture of openness and fairness and has expected that elected members and employees at all levels will adopt the highest standards of propriety and accountability. This has been achieved by leading by example and by an understanding of and adherence to rules, procedures and agreed practices. These standards are also expected from organisations that have dealings with the authority (eg suppliers/contractors).
- 1.3 However, in light of the Nolan Report, several well-publicised fraud and corruption cases within local government and the Local Government Act 2000, the authority has formalised these accepted standards and practices and developed an anti-fraud and corruption policy.
- 1.4 The authority demonstrates clearly (through this policy) that it is firmly committed to dealing with fraud and corruption and no distinction will be made for perpetrators inside (members/governors and employees) or outside the authority. In addition, there will be no distinction made in investigation and action between cases that generate financial benefits and those that do not.
- 1.5 This policy document embodies a series of measures designed to frustrate any attempted fraudulent or corrupt act and the steps to be taken if such an act occurs. For ease of understanding, it is separated into the following sections:
- Culture Section 2
 - Prevention Section 3
 - Deterrence Section 4
 - Detection and investigation Section 5
 - Awareness and Training Section 6
- 1.6 The authority is also aware of the high degree of external scrutiny of its affairs by a variety of bodies such as its External Auditors, inspection bodies, the Local Government Ombudsman, HM Revenue & Customs. These bodies are important in highlighting any areas where improvements can be made.
- 1.7 Fraud and corruption are defined by the Audit Commission as:
- FRAUD – “the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain”.***

In addition, fraud can also be defined as:

“The use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.”

- 1.8 Corruption is the deliberate misuse of your position for direct or indirect personal gain. Corruption includes offering, giving, requesting or accepting bribe or reward, which influences your actions or the actions of someone else.
- 1.9 The Council’s Anti-Bribery Policy provides further details on bribery and the Council’s procedures in this area.
- 1.10 Other risk areas which need to be considered and are covered by this policy include:
Facilitation payments – i.e. payments designed to make things happen but do not secure agreement. Section 106 payments are the subject of legal debate in this area.
Gifts and Hospitality – genuine low level hospitality is deemed acceptable but it is imperative that registers are kept up to date and all staff must make declarations of interest.
Disclosures of Interests – and ‘the failure to disclose an interest in order to gain financial or other pecuniary gain’.

2. CULTURE

- 2.1 The culture of the authority has always been one of the highest ethical standards, probity, openness and the core values of fairness, trust and value support this. The authority’s culture therefore supports the opposition to fraud and corruption.
- 2.2 The prevention/detection of fraud/corruption and the protection of the public purse are everyone’s responsibility and of paramount importance to the authority.
- 2.3 The authority’s elected members and all employees play an important role in creating and maintaining this culture. They are positively encouraged to raise concerns regarding fraud and corruption, immaterial of seniority, rank or status, in the knowledge that such concerns will, wherever possible, be treated in confidence. To that effect the Council has adopted a Whistleblowing Policy.
- 2.4 The definitions of Fraud and Corruption are by their nature technical and have their basis in the Fraud Act which became law on 15th January 2007. A more practical definition is where the Council’s assets, including money, are dishonestly obtained by someone not entitled to them. Examples include :
- theft of cash or assets;
 - obtaining access to services not entitled to e.g. obtaining a Council house or grant funding;
 - falsifying information or documentation e.g. timesheets, overtime, expenses, qualifications etc;
 - dishonesty between officers and management;

- the deliberate concealment of information required by the Council e.g. convictions or activities inconsistent with the Council's duties and responsibilities; and
- Defrauding welfare payments such as Housing Benefit and Council Tax benefit and Council Tax Single Person Discounts etc.

- 2.5 The authority will ensure that any allegations received in any way, including by anonymous letters or phone calls, will be taken seriously and investigated in an appropriate manner, subject to the requirements of the Human Rights Act 1998 and other statutory provisions.
- 2.6 The authority will deal firmly with those who defraud the authority, or who are corrupt, or where there has been financial malpractice. There is, of course, a need to ensure that any investigation process is not misused and, therefore, any abuse (such as raising malicious allegations) may be dealt with as appropriate.
- 2.7 When fraud or corruption have occurred because of a breakdown in the authority's systems or procedures, Corporate or Service Directors will ensure that appropriate improvements in systems of control are implemented to prevent a reoccurrence.
- 2.8 In certain circumstances and where appropriate a commercial settlement between the Council and an employee may be deemed necessary as a way of disposing of a case. This should only be undertaken following agreement by the Chief Executive and Monitoring Officer and following an independent review by Counsel.

3. ROLES

Elected Members	<p>As elected representatives, all members of the authority have a duty to citizens to protect the authority from all forms of abuse. This is done through this anti-fraud and corruption policy and compliance with the national code of conduct for members, the authority's Financial Procedure Rules, Constitution and the relevant legislation.</p> <p>Elected members sign to the effect that they have read and understood the national code of conduct when they take office. Conduct and ethical matters are specifically brought to the attention of members during induction and include the declaration and registration of interests. The Monitoring Officer should advise members of new legislative or procedural requirements.</p> <p>Members are required to apply the principles of good governance regarding their own affairs and when acting for the Council including declare pecuniary or non-pecuniary interests, potential for a conflict of interest and record the receipt of all gifts and hospitality. Members must provide leadership by example in demonstrating the highest standards of probity and conduct so as to create the right anti fraud culture throughout Melton Borough Council.</p>
Governance Committee	<p>The Governance Committee and its members have specific responsibility re: the oversight of the Council's governance arrangements in respect of the adequacy of control systems to prevent and detect fraud but also the assurance that processes work effectively for individual cases.</p> <p>The Governance Committee considers annual reports from Internal Audit on suspected and proven frauds and monitors those systems of control applicable to that area, making recommendation to Council where such protection requires improvement.</p>

<p>SMT</p>	<p>SMT are responsible for the communication and implementation of this policy in their work area. They are also responsible for ensuring that their employees are aware of the Financial Procedure Rules and other policies, and that the requirements of each are being met in their everyday business activities.</p> <p>SMT have responsibility to ensure that effective systems of control are in place corporately and within their directorate to both prevent and detect fraud and that those systems operate properly.</p> <p>SMT are required to submit an annual self assessment of those processes for inclusion within the Council’s Annual Governance Statement.</p> <p>SMT must provide leadership by example in demonstrating the highest standards of probity and conduct so as to create the right anti-fraud culture throughout Melton Borough Council. SMT are expected to strive to create an environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities.</p>
<p>Heads of Service/ Managers</p>	<p>Managers at all levels are responsible for the communication and implementation of this policy in their work area. They are also responsible for ensuring that their employees are aware of the Financial Procedure Rules and other policies, and that the requirements of each are being met in their everyday business activities.</p> <p>Managers of all levels must provide leadership by example is demonstrating the highest standards of probity and conduct so as to create the right anti-fraud culture throughout Melton Borough Council. Managers of all levels are expected to strive to create an environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities.</p> <p>Heads of Service and Managers must ensure that special arrangements will apply where employees are responsible for cash handling or are in charge of financial systems and systems that generate payments, for example payroll, the integrated benefits computer system or council tax. Managers must ensure that relevant training is provided for employees. Checks must be carried out at least annually to ensure that proper procedures are being followed in order to inform the directorate annual self assessment.</p> <p>The authority recognises that a key preventative measure in</p>

	<p>dealing with fraud and corruption is for managers to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts. The authority's recruitment procedures will be adhered to during this process.</p> <p>Management investigations into disciplinary matters must liaise with the Head of Audit regarding any potential fraud implications of the conduct / investigation.</p>
Internal Audit	<p>The Head of Audit shall recommend to the Corporate Director whether a concern / suspicion regarding fraud requires investigation by the Internal Audit Investigators as opposed to management.</p> <p>Internal Audit plays a vital preventative role in trying to ensure that systems and procedures are in place to prevent and detect fraud and corruption. The Internal Audit Investigators liaise with management to recommend changes in procedures to prevent further losses to the authority.</p> <p>The Internal Audit service shall report to SMT and the Governance Committee regarding the application of the zero tolerance statement within this policy. Furthermore, the Internal Audit Investigators shall investigate all cases of suspected irregularity in accordance with the requirements of the Police and Criminal Evidence Act 1984, Human Rights Act 1998, Fraud Act 2006, Bribery Act 2010 and other relevant legislation. In all corporate related cases where employees are involved, they will work with HR and appropriate senior management to ensure that correct procedures are followed and that this policy is adhered to.</p> <p>The Head of Internal Audit maintains the Council's Fraud Log which is presented to the Governance Committee on an annual basis. The Head of Internal Audit will also review the Council's Counter Fraud Strategy and any action plans on a regular basis.</p>

<p>Employees</p>	<p>Each employee is governed in their work by the authority's Constitution and Financial Procedure Rules and other codes of conduct and policies (health and safety, IT strategy, IT security). Included in these are guidelines on gifts and hospitality and codes of conduct associated with professional and personal conduct and conflicts of interest. These are issued to all employees when they join the authority or will be provided by their manager.</p> <p>In addition to the above, employees are responsible for ensuring that they follow the instructions given to them by management, particularly in relation to the safekeeping of the assets of the authority. These will be included in induction training and procedure manuals.</p> <p>Employees are expected always to be aware of the possibility that fraud, corruption or theft may exist in the workplace and be able to share their concerns with management. Concerns should be raised, in the first instance, directly with the supervisor/business unit manager. If the employee feels that they cannot discuss their concerns directly with their line management they should refer to the Council's Whistleblowing Policy which gives details of independent persons they can discuss their concerns.</p> <p>All employees must ensure that they avoid situations where there is a potential for a conflict of interest. Such situations can arise with externalisation of services. Internal tendering, planning and land issues etc. Effective role separation will ensure decisions made are seen to be based upon impartial advice and avoid questions about improper disclosure of confidential information.</p>
<p>External Audit</p>	<p>Independent external audit is an essential safeguard in the stewardship of public money. This role is delivered through the carrying out of specific reviews that are designed to test (amongst other things) the adequacy of the authority's financial systems, and arrangements for preventing and detecting fraud and corruption. It is not the external auditor's function to prevent fraud and irregularity, but the integrity of public funds is at all times a matter of general concern. External auditors are always alert to the possibility of fraud and irregularity, and will act without undue delay if grounds for suspicion come to their notice. The external auditor has a responsibility to review the authority's arrangements to prevent and detect fraud and irregularity, and arrangements designed to limit the opportunity for corrupt practices.</p>

External Bodies	<p>Internal Audit has arranged and will keep under review procedures and arrangements to develop and encourage the exchange of information on national and local fraud and corruption activity in relation to local authorities with external agencies such as: police, county, unitary and district Council groups, external audit service, Department of Works and Pensions and other government departments.</p>
Contractors and Partners	<p>Contractors and partners have a responsibility for the communication and implementation of this policy within their organisation. They are also responsible for ensuring that their employees are aware of the Council's Financial Procedure Rules, Whistleblowing and other policies, and that the requirements of each are being met in their everyday business activities.</p> <p>Contractors and partners are expected to create an environment in which their staff feel able to approach them (or the Council directly) with any concerns they may have about suspected irregularities. Where they are unsure of the procedures, they must refer to the relevant Head of Service for that area or may approach the Head of Internal Audit directly on any whistleblowing issue.</p>
Stakeholders and Customers	<p>Whilst this policy is primarily aimed at implementing the necessary culture and processes within the Council its Stakeholders and customers may become aware of issues that they feel may indicate fraud. They should refer to the Council's Whistleblowing policy or they can contact the Head of Internal Audit to discuss their concerns directly.</p>

4. DETERRENCE

4.1. Prosecution

4.2.1 Each case will be considered on its merits.

4.2. Disciplinary Action

4.2.2 Theft, fraud and corruption are serious offences against the authority and employees will face disciplinary action if there is evidence that they have been involved in these activities. Disciplinary action will be taken, if appropriate, in addition to criminal proceedings, depending on the circumstances of each individual case.

4.2.3 Disciplinary action will be undertaken in accordance with the Council's disciplinary policy and procedure with each case considered on its merits.

4.2.4 Allegations against Members will be dealt with under the Member Complaints Process.

4.2.5 Members or employees involved in fraud, theft or corruption that does not involve the Council or its finances may still be subject to the above action if it is considered to undermine the Council and its reputation.

4.3. Publicity

4.2.6 The Council recognises the key role publicity of fraud cases pursued plays in deterring other attempts to defraud the Council. To that effect a Publicity Policy is attached at Annex A of this policy which sets out these measures in detail.

4.3.1 The authority's Communications officers will optimise the publicity opportunities associated with anti-fraud and corruption activity within the authority. Management will also try to ensure that the results of any action taken, including prosecutions, are reported in the media. Communications officers will maintain close working relationships with all areas involved in anti-fraud work but particularly Legal Services and Internal Audit.

4.3.2 In all cases where financial loss to the authority has occurred, the authority will seek to recover the loss and publicise this fact.

4.3.3 All anti-fraud and corruption activities, including the update of this policy, will be publicised in order to make the employees and the public aware of the authority's commitment to taking action on fraud and corruption when it occurs.

4.3.4 Regular reports will be made to the Governance committee about countering fraud and corruption activities and their success.

5. DETECTION AND INVESTIGATION

5.1 All staff, Members and any other stakeholder in Council services have a vital role in identifying potential fraud or corruption. It is not the responsibility of those groups to investigate their suspicions as this may undermine a case to be pursued but all

parties play a key role in bringing such concerns to the Council's attention for a proper and thorough investigation to be undertaken.

5.2 Management are in the best position to become aware of any problems that could indicate fraud or theft etc. Management are also best placed to ensure that systems of internal control are in place and operating and thus are ideally placed to identify weaknesses or failures that may be exploited. Internal Audit can provide advice and assistance in this area.

5.3 Employees are also ideally placed to detect fraud, theft or corruption. Employees are encouraged to discuss concerns with their line manager but the Whistleblowing Policy also provides mechanisms to raise concerns corporately.

5.4 The Whistleblowing Policy provides a process to enable the Council to demonstrate :

- Proper investigations for all referrals
- Proper action taken in relation to findings from investigations
- Feedback is provided to anyone making a referral
- Appropriate protection for anyone making or having made a referral.

5.5 Internal Audit plays an important role in the detection of fraud and corruption. Included in the annual Audit Plan are reviews of system of financial controls and specific fraud and corruption tests. Fraud risks are considered in the scoping of every audit assignment. Internal Audit operates in accordance with best practice including the adoption of a formal Audit Manual in line with CIPFA best practice and the Public Sector Internal Audit Standards. This includes suitable processes to provide assurance to management on the adequacy of systems of internal control including the completion of follow ups for previous recommendations.

5.6 In addition to internal audit, there are numerous systems controls in place to deter fraud and corruption, but it is often the vigilance of employees and members of the public that aids detection.

5.7 In some cases frauds are discovered by chance or 'tip-off' and arrangements are in place to enable such information to be properly dealt with, in accordance with the requirements of the Human Rights Act 1998.

5.8 All suspected irregularities are required to be reported (verbally or in writing) either by the person with whom the initial concern was raised or by the originator. This is essential to the policy, and:

- ensures the consistent treatment of information regarding fraud and corruption; and
- facilitates a proper and thorough investigation.

5.9 This process will apply to all the following areas:

- a) fraud/corruption by elected members;
- b) internal fraud/corruption;
- c) other fraud/corruption by authority employees;
- d) fraud by contractors' employees; and
- e) external fraud (the public).

5.10 Cases under a) will be referred to the Council's External Auditor and the Monitoring Officer.

5.11 In accordance with basic legal concepts any person who witnesses or discovers a criminal act has the right to refer concerns directly to the police.

5.12 Any decision to refer a matter to the police will be taken by the Corporate Director in consultation with the Chief Executive and Corporate Governance Group. The authority will normally wish the police to be made aware of, and investigate independently, offenders where financial impropriety is discovered.

5.13 Depending on the nature of an allegation under b) to e), the Head of Internal Audit will normally work closely with the Head of Service concerned to ensure that all allegations are thoroughly investigated and reported upon.

5.14 The authority's disciplinary procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour by employees.

6. AWARENESS AND TRAINING

- 6.1.** The authority recognises that the continuing success of this policy and its general credibility will depend in part on the effectiveness of programmed training and an awareness of elected members and employees throughout the authority.
- 6.2.** To facilitate this in the past, positive and appropriate provision had been made via induction and for employees via their development plans. However, for the future it is intended that a programme of anti-fraud awareness training in the form of workshops possibly incorporating interactive means, will be rolled out across the Council. There will still be specialist training for certain elected members and employees.
- 6.3.** All employees have access to full copies of the Whistleblowing Policy, Counter Fraud and Corruption Policy, Money Laundering Policy and Anti-Bribery Policy on the Council's network.
- 6.4.** Key to effective awareness (and deterrent) is a formal and comprehensive system of feedback to provide outcome information to the person who originally referred concerns. Whilst confidentiality must be respected (including the Data Protection Act and Human Rights Act provisions) every referral should be concluded and the outcome communicated to the person making the original referral.
- 6.5.** Anti-fraud services should also maintain management information to show :
- How frauds are identified
 - Which type of frauds were affected
 - Any patterns or themes detected
 - New fraud issues highlighted
 - Prevention measures

Publicity

1. Introduction

- 1.1 Melton Borough Council has adopted this policy to address counter fraud and corruption issues enhancing public confidence in the administration of taxpayers' money.
- 1.2 The Counter Fraud & Corruption Policy and particularly this Publicity section aim to :
- 1.2.1 Make clear the connection between saving public monies and the fraud work that achieves this.
 - 1.2.2 Dispel the belief held in some quarters that fraud is a victimless crime
 - 1.2.3 Demonstrate consistent action is taken for both complex frauds and the perceived lower level frauds
 - 1.2.4 Ensure that tough action taken against persons who commit fraud is utilised as an effective deterrent to others
 - 1.2.5 Alter perceptions of this area of work to move from an image of petty bureaucracy or snoopers to one of professional public funds watchdog.
 - 1.2.6 Ensuring that action taken is consistent with Melton Borough Council policies and legislative provisions as well as being in the public interest
- 1.3 This policy covers the methods by which the counter fraud work by the authority will be promoted including the publicity associated with specific cases.

2 Publicity Categories

- 2.1 Publicity takes many forms including
- Leaflets
 - Posters
 - Press Releases / Articles
 - Advertisements
 - Intranet or Internet media
- 2.2 It is imperative that all available forms are maximised to promote a zero tolerance culture towards fraud throughout the organisation and to the public. However great care is needed to ensure that publicity in relation to anti-fraud work is positive and does not undermine the service or reinforce the negative perceptions of this area of work.
- 2.3 Thus publicity needs to focus on three key areas :
- 2.3.1 Pro-active publicity of counter fraud work
 - 2.3.2 Specific cases pursued e.g. specific prosecutions / convictions sought; and
 - 2.3.3 Reactive responses to Media enquiries.

3 Proactive publicity of counter fraud work

- 3.1 This area of work is essential to promote the work of the services and ensure that others are aware of this work and thus deterred from attempting fraud. The aim of this publicity is to increase the profile of anti-fraud work across Melton Borough Council and the wider community in order to promote the referral processes and deter fraud.
- 3.2 An internet/intranet site shall be maintained which sets out details as to how to report fraud. The site will also provide links to relevant policies.
- 3.3 Any materials used for Fraud Awareness purposes shall be reviewed annually to reflect any necessary changes.
- 3.4 Fraud Awareness training is part of the Council's Corporate Training/Induction system.
- 3.5 In addition to the above the counter fraud work shall be promoted periodically both within the Council and to the general community.

4 Specific Cases

- 4.1 Great care must be taken when publicising any specific case of fraud, theft or corruption. Data Protection Act and Human Rights Act provisions are key legal protections provided to those suspected of committing such offences and must not be breached by the Council's attempts to promote anti-fraud work.
- 4.2 However the publicity attached to any specific case is a necessary element of promoting the deterrent effect of anti-fraud work as it demonstrates actual instances and consequences to individuals.
- 4.3 Any decision that the Council should prosecute an individual, individuals or organisation must be taken following a formal quality assurance procedure.
- 4.4 Any decision to pursue prosecution will be taken on the basis of professional advice, the merits of the case itself and any applicable guidelines.
- 4.5 All prosecutions should include a consideration of publicity issues and ensure that the Council's communications team are involved / aware of the issue so that the Council can adopt a proactive publicity strategy and avoid the need to react to press enquiries.
- 4.6 A specific decision will be taken and recorded by the Head of Service to issue a press release for any specific case, in consultation with the Head of Internal Audit and Corporate Director. If the criminal investigation remains ongoing, any decision to publicise the matter must be formally agreed with the relevant police lead. In all other cases a press statement / position shall be prepared to address any potential press enquiry.
- 4.7 Press releases shall be prepared that promote the Council's Counter Fraud and Corruption policy and maximise the deterrent effect of prosecutions.

5 Reactive Responses to Media Enquiries

- 5.1 Ideally the above measures aim to minimise the need for this where the Council proactively provides relevant information to promote anti-fraud through local (and possibly national) media.
- 5.2 Press queries will arise on some occasions and it is essential that they are responded to in such a way as to promote the anti-fraud policy of the Council.
- 5.3 Responses to Press queries regarding specific individuals must not breach Data Protection or Human Rights legislation.

Melton Borough Council

Anti-Bribery

POLICY AND PROCEDURES

Document Details:

Monitoring Officer

March 2017

Anti-Bribery Policy and Procedures

This Statement sets out Melton Borough Council's (the Council's) policy in relation to bribery.

The Council takes its responsibilities to protect the public purse very seriously and is fully committed to the highest ethical standards, in order to ensure the proper use and protection of public funds and assets. To achieve the objectives set out within the Council's Corporate Plan 2015-20, the Council needs to maximise the financial resources available to it. In order to do this, the Council has an ongoing commitment to continue to improve its resilience to fraud, corruption (including bribery) and other forms of financial irregularity.

The Council advocates **strict adherence** to its anti-fraud policy and associated policies. Whilst individual circumstances of each case will be carefully considered, in the majority of cases there will be a zero tolerance approach to fraud and corruption (including bribery) in all of its forms. The Council will not tolerate fraud or corruption by its councillors, employees, suppliers, contractors, partners or service users and will take all necessary steps to investigate all allegations of fraud or corruption and pursue sanctions available in each case, including removal from office, disciplinary action, dismissal, civil action for recovery and/or referral to the Police and/or other agencies. The required ethical standards are included in both the Members' Code of Conduct and Officers' Code of Conduct, both documents forming part of the overall Constitution of the Council.

The Council fully recognises its responsibility for spending public money and holding public assets. The prevention, and if necessary the investigation, of fraud and corruption (including bribery) is therefore seen as an important aspect of its duties which it is committed to undertake. The procedures and also the culture of the Council are recognised as important in ensuring a high standard of public life.

The Council's general belief and expectation is that those associated with it (employees, members, service users, contractors and voluntary bodies) will act with honesty and integrity. In particular members and employees are expected to lead by example and will be accountable for their actions.

The Council will take steps to help ensure high standards of ethical behavior are adopted in partnerships to which the Council is a member. This will be done through applying appropriate elements of this document to all partnership working, where it is relevant to do so. With regard to partnership working, responsibility for Codes of Conduct and policies of this nature (and so for enforcement action for breach of those codes or policies) generally lies with the relevant individual organisation in the partnership. Where appropriate, the Council will draw the attention of the partner organisation to its concerns.

1. What is Bribery?

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

2. The Bribery Act

There are four key offences under the 2010 Bribery Act:

- Bribery of another person (section 1)
- Accepting a bribe (section 2)
- Bribing a foreign official (section 6)
- Failing to prevent bribery (section 7)

The Bribery Act 2010 (http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1) makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2). Section 6 of the Act creates a separate offence of bribing a foreign public official with the intention of obtaining or retaining business or an advantage in the conduct of business. There is also a corporate offence under Section 7 of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. An organisation will have a defense to this corporate offence if it can show that it had in place adequate procedures designed to prevent bribery by or of persons associated with the organisation.

3. Penalties

An individual guilty of an offence under sections 1, 2 or 6 is liable:

- On conviction in a magistrates court, to imprisonment for a maximum term of 12 months, or to a fine not exceeding £5,000, or to both
- On conviction in a crown court, to imprisonment for a maximum term of ten years, or to an unlimited fine, or both

Organisations are liable for these fines and if guilty of an offence under section 7 are liable to an unlimited fine.

4. Public contracts and failure to prevent bribery

Under the Public Contracts Regulations 2006 (which gives effect to EU law in the UK), a company is automatically debarred from competing for public contracts where it is convicted of a corruption offence, including bribery. The Council will, in such cases, exclude organisations convicted of any such offences from participating in tenders for public contracts with it.

5. Policy Statement – Anti-Bribery

Bribery, either directly between two parties or using a third party as a conduit to channel bribes to others, is a criminal offence. Melton Borough Council (the Council) does not, and will not, pay bribes or offer an improper inducement to anyone for any purpose, nor does it or will it, accept bribes or improper inducements or engage indirectly in or otherwise encourage bribery.

The Council is committed to the prevention, deterrence and detection of bribery. It has a zero-tolerance approach towards bribery.

The Council aims to maintain anti-bribery compliance “business as usual”, rather than as a one-off exercise.

6. Objective of this policy

This policy provides a coherent and consistent framework to enable the Council’s employees (and other ‘relevant persons’) to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

The Council requires that all relevant persons, including those permanently employed, temporary staff, agency staff, consultants, contractors, volunteers, partners and Members:

- Act honestly and with integrity at all times and to safeguard the Council’s resources for which they are responsible
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the Council operates, in respect of the lawful and responsible conduct of activities

7. Scope of this policy

This policy applies to all of the Council’s activities. For partners, joint ventures and suppliers, it will seek to promote the adoption of policies consistent with the principles set out in this policy.

Responsibility to control the risk of bribery occurring resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units and corporate functions.

This policy covers all personnel, including all levels and grades, those permanently employed, temporary agency staff, contractors, agents, Members, volunteers and consultants.

8. The Council’s commitment to action

The Council commits to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery
- Provide information to all employees to report breaches and suspected breaches of this policy
- Include appropriate clauses in contracts to prevent bribery.

9. Bribery is not tolerated

It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- accept payment from a third party where it is known or suspected that it is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be provided by the Council in return
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in activity in breach of this policy.

10. Gifts and Hospitality

This policy is not meant to change the requirements of the Council's gifts and hospitality policy included in the Code of Conduct for both Members and Officers. This makes it clear that:

- Nominal gifts and hospitality are often acceptable, depending upon the circumstances
- Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are often acceptable.

In general terms, however, an employee must:

- Treat any offer of a gift or hospitality if it is made to them personally with extreme caution

- Not receive any reward or fee other than their salary (or election fees where applicable.)
- Never accept monetary gifts of any kind
- Always refuse offers of gifts or services to them (or their family members) from organisations or persons who do, or might, provide work, goods or services, to the Council or who require a decision from the Council
- Always report any such offer to their line manager.

When deciding whether or not to accept an offer of a gift, the context is very important. An offer from an organisation seeking to do business with or provide services to the Council or in the process of applying for permission or some other decision from the Council is unlikely ever to be acceptable, regardless of the value of the gift.

Elected Members must comply with the Council's policy and relevant legislation regarding hospitality and gifts.

11. Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All staff are required to avoid activity that breaches this policy.

As individuals you must:

- ensure that you read, understand and comply with this policy
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

As well as the possibility of civil legal action and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

12. Raising a concern

The Council is committed to ensuring that there is a safe, reliable, and confidential way of reporting any suspicious activity, and wants each and every member of staff to know how they can raise concerns.

All have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner it is brought to attention, the sooner it can be resolved.

There are multiple channels to help raise concerns. Please refer to the Council's Whistleblowing policy and determine the favoured course of action. Preferably the disclosure will be made and resolved internally (e.g. to a line manager or head of service). Secondly, where disclosure in the Service area proves inappropriate, concerns can be raised with the Monitoring Officer, the Chief Executive, Head of Welland Internal Audit Consortium or the External Auditor. Raising concerns in these ways may be more likely to be considered reasonable than making disclosures publicly (e.g. to the media).

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrong doing is reported, the Council will act as soon as possible to evaluate the situation. It has clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in an investigation of this kind. This is easier and quicker if concerns raised are not anonymous.

Staff who raise concerns or report wrongdoing, including those staff who reject an offer made to them that could be perceived as bribery, could understandably be worried about the repercussions. The Council aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

The Council is committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

13. Other relevant policies

Further information on relevant Council policy and practice can be found in the following internal documents:

- The Constitution (includes Financial Procedure Rules, Contract Procedure Rules, Members' Code of Conduct and Officers' Code of Conduct)
- Counter Fraud Policy
- Whistleblowing Policy
- Codes of Conduct (Gifts & Hospitality sections)
- Anti-Money Laundering Policy

14. Useful links

- [The Bribery Act 2010](#)
- [Bribery Act guidance](#)
- [CIPFA's Code of Practice on Managing the Risk of Fraud and Corruption](#)
- [Local Government Fraud Strategy – Fighting Fraud Locally](#)

15. Policy review

The Monitoring Officer and the Council's Governance Committee will ensure the continuous review and amendment of this policy document, to ensure that it remains compliant with good practice national public sector standards, primarily CIPFA's Code of Practice on Managing the Risk of Fraud and Corruption and the Local Government Fraud Strategy – Fighting Fraud Locally, and meets the needs of Melton Borough Council.

Responsible Officer: Monitoring Officer

Anti-Money Laundering Policy

1.0 Introduction

- 1.1 Melton Borough Council will do all it can to prevent the Council and its staff being exposed to money laundering, to identify the potential areas where it may occur, and to comply with all legal and regulatory requirements, especially in the proper reporting of actual or suspected cases.
- 1.2 Money laundering is widely defined as 'possessing, concealing, disguising or in any way dealing with the proceeds of any crime by any person known or unknown'. The Money Laundering Regulations 2007 and the Proceeds of Crime Act 2002 broadened the definition of money laundering and increased the range of activities covered by the statutory framework.
- 1.3 This policy has been written to enable the Council to meet its legal requirements in a proportionate manner. It is recognised that the majority of money laundering activity in the United Kingdom falls outside of the public sector but vigilance by employees of the Council can help to identify those who are or may be perpetrating crimes relating to the financing of terrorism and money laundering.
- 1.4 This policy should be read in conjunction with the supporting Employee Guidance [LINK].

2.0 SCOPE

- 2.1 This protocol therefore applies to **all** Melton Borough Council employees, Members, temporary and agency staff, volunteers, contractors, agents, consultants and partners acting on the Council's behalf, all of whom could potentially contravene the money laundering regulations.
- 2.2 The policy serves to protect the Council's employees by making them aware of their personal obligations and by providing them with a mechanism to raise any concerns. Failure to comply with the procedures set out in the policy may lead to disciplinary action.

3.0 Definition

- 3.1 Money laundering is defined as:
 - concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the Proceeds of Crime Act 2002);
 - entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328 of the Proceeds of Crime Act 2002);
 - acquiring, using or possessing criminal property (section 329 of the Proceeds of Crime Act 2002); or
 - becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorist property (section 18 of the Terrorism Act 2000).

- 3.2 Effectively, money laundering is the term used for disguising criminally sourced cash or property in order to give the appearance of legitimacy. This is done by mixing the criminal transactions with the legitimate transactions of businesses.
- 3.3 Potentially any individual could contravene the money laundering provisions if they know of or suspect money laundering and either become involved with it in some way and/or do not report it.
- 3.3 In addition, there is an offence of ‘Tipping off’ - this is where someone informs a person or people who are, or who are suspected of being, involved in money laundering in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation (section 342 of the Proceeds of Crime Act 2002).
- 3.4 Whilst the risk to the Council of contravening the legislation is low because the Council does not deal in substantial cash transactions, it is **extremely important that all employees are familiar with their legal responsibilities**, as serious criminal sanctions may be imposed for breaches of the legislation. The key requirement on employees is to promptly report any suspected money laundering activity to the nominated Money Laundering Reporting Officer.

4.0 The Council’s Obligations

4.1 To comply with its statutory obligations the Council has:

- Appointed a Money Laundering Reporting Officer (MLRO) to receive disclosures about money laundering concerns. The Council’s MLRO is the **Corporate Director**. Their contact details can be found in the Anti-Money Laundering - Employee Guidance.

In the absence of the Corporate Director, any concerns should be promptly referred to the **Central Services Manager**, as deputy MLRO, who will ensure appropriate steps are taken to review and report the matter.

- Implemented a procedure for the reporting of money laundering suspicions. This has been communicated to its employees through this policy and its supporting Employee Guidance.

5.0 Prevention

5.1 The Council discourages cash payments and offers alternative payment methods but in certain circumstances will take cash payments e.g. where rejecting a cash payment is likely to increase the risk of non-payment of debt. However, it will not accept **cash payments** in excess of £1,000. Payees should be asked to pay any sums owed to the Council in excess of £1,000 by cheque or other financial instrument. The only exception to this limit can be payment of eviction arrears, which must be handled in accordance with the Council’s ‘Cash Handling – Evictions’ procedures.

- 5.2 Where the Council is dealing with a **new customer/client** steps should be taken to confirm the identity of that customer/client where the Council:
- intends to form an ongoing business relationship with the customer/client; or
 - undertakes a one-off transaction involving payment by or to the customer/client of £10,000 or more; or
 - undertakes a series of linked one-off transactions involving total payment by or to the customer/client of £10,000 or more; or
 - it is known or suspected that a one-off transaction (or a series of them) involves money laundering.
- 5.3 It is the responsibility of the service building the relationship with the customer/client to obtain satisfactory evidence of identity. Written instructions at the outset of the matter on either the organisation's official letterhead, or an email from the organisation, would be appropriate evidence of identity.
- 5.4 If the identity is not confirmed in this way the business relationship or transaction **should not proceed**.

6.0 Disclosure

- 6.1 Where an individual knows or suspects that money laundering is taking place or has taken place, they **must** immediately contact the MLRO – a template form is provided in Appendix A to this policy. The provisions of the Act mean that failure to notify the MLRO immediately could potentially result in the employee being prosecuted.
- 6.2 Once the individual has reported the matter to the MLRO they **must not** make any further enquiries into the matter and must not take any further steps in any related transaction without authorisation from the MLRO.
- 6.3 Under no circumstances should an individual voice any suspicions to the person(s) suspected of money laundering or discuss this with others.
- 6.4 Employees should not make any reference on a client file to a report having been made to the MLRO.
- 6.5 Where there is evidence of money laundering, the MLRO or deputy will disclose the matter as soon as practicable to the National Crime Agency (NCA). Further details can be found in the Employee Guidance.
- 6.6 The MLRO or deputy must, if they so determine, promptly report the matter to NCA on their standard report form and in the prescribed manner. Up to date forms can be downloaded from the NCA website at www.nationalcrimeagency.gov.uk.
- 6.7 The MLRO will commit a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

7.0 Guidance and Training

7.1 In support of the policy and procedure, the Council will:

- make all staff aware of the requirements and obligations placed on the Council and on themselves as individuals by the anti-money laundering legislation through the publicising and availability of this policy and supporting guidance; and
- give targeted training to those most likely to encounter money laundering as part of their role with the Council.

8.0 Conclusion

8.1 Given the nature the Council's activities and who it can provide services for, instances of suspected money laundering should pose a low risk. However, all individuals working for the Council must be aware of their responsibilities in reporting any concerns and remain vigilant.

8.2 Please take prompt and proper action if you have any suspicions and feel free to consult the MLRO (Corporate Director) at any time should you be concerned with any issues relating to money laundering.

Policy owned by: Corporate Director

Approved by: Full Council
Date: 12 October 2016

Next review: [3 yearly]

MONEY LAUNDERING REPORTING OFFICER DISCLOSURE FORM

Date of disclosure	
Name and job title of officer making disclosure	
Officer contact details	
Subject details (if your concerns are regarding an individual)	
Title	
Surname	
Forename	
Date of Birth	
In case of a legal entity (if your concerns are regarding a company)	
Name	
Address	
Company number (if known)	
Reason for disclosure	
<i>Please explain why you are suspicious. Outline the details of the activities, the values and who was involved (what, when, where, how). Please provide as much information as you can. Continue on a separate sheet, if necessary.</i>	

Please send to the **Corporate Director** as soon as possible to report your concerns. If the Corporate Director is not available, please report these concerns to the **Central Services Manager**.

