

HUNTINGDONSHIRE DISTRICT COUNCIL

Anti-Fraud and Corruption Strategy 2018 - 2021

Anti-Fraud and Corruption Statement

Huntingdonshire District Council is committed to the highest possible standards of honesty, openness and accountability.

It will ensure that internal procedures are in place to identify, deter and prevent the risk of fraud and corruption and maintain clear and well publicised arrangements for receiving and investigating complaints.

The Council will pursue appropriate action, including the recovery of any losses it has suffered, in every case where fraud and corruption has been found.

1 Introduction

- 1.1 Huntingdonshire District Council has in place effective systems to monitor, identify and investigate cases of fraud and corruption. It is aware that the incidents of fraud are increasing across the public sector and that it needs to continue to be both proactive and innovative in the fight against fraud.
- 1.2 The Council is determined that a culture of honesty, openness and accountability will always be promoted. The risk of dishonest acts being committed against the Council, no matter who by, undermine the high standards of conduct and public service that it aims to achieve.

This Strategy describes how the Council will respond to that risk.

2 Definitions

- 2.1 The Council defines fraud and corruption in the following ways:

Fraud is an act of dishonesty, by which a person obtains a benefit or causes the Council a loss, by deception or other means (e.g. false representation, failing to disclose information or through abuse of position).

Corruption is the abuse of public office for private gain (e.g. offering, giving, soliciting or acceptance of an inducement, reward or bribe which may improperly influence the action of any person).

2. Responsibility

- 2.1 The Code of Financial Management states that Directors and Heads of Service are responsible for the prevention of fraud and corruption within the services and functions under their control. They are required to establish, maintain and document their systems of internal control and ensure that relevant employees or Members are familiar with these systems.
- 2.2 Heads of Service shall be responsible for identifying, assessing and recording all significant fraud and corruption risks within the Council's risk register.
- 2.3 All policies, procedures or documents that support this Strategy shall be reviewed annually by the appropriate Head of Service.
- 2.4 To ensure this Strategy remains effective, the S151 Officer and the Corporate Director (Services) shall review it at least once every three years. Changes to the Strategy shall be agreed by the Corporate Governance Committee.

3. The Principles of Conduct

- 3.1 The culture of the Council is a key control measure, shaped by a consistent 'tone from the top' and an underlying ethos of strong governance, professional standards, checking and compliance.
- 3.2 Every Member and employee is responsible for playing their part in ensuring that public confidence in the services provided by the Council is maintained and they will promote a culture of honesty and the opposition to fraud and corruption based on the seven principles of public life.

Selflessness Act solely in terms of the public interest.

Integrity Avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity Act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability Be accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness Act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty Be truthful.

Leadership Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly

support the principles and be willing to challenge poor behaviour wherever it occurs.

4. Reducing the risk of fraud and corruption

- 4.1 The Corporate Fraud Manager will maintain a programme of counter fraud and corruption work that is proportionate to the fraud and corruption risks that the Council faces.

The programme will be consistent with the principles of Acknowledge, Prevent and Pursue as contained in the Local Government Counter Fraud & Corruption Strategy 2016-2019.

Acknowledge	Acknowledging and understanding fraud risks	Assessing and understanding fraud risks. Committing support and resource to tackling fraud Maintaining a robust anti-fraud response.
Prevent	Preventing and detecting fraud	Making better use of information and technology. Enhancing fraud controls and processes. Developing a more effective anti-fraud culture.
Pursue	Pursuing those who commit fraud and recovering losses	Prioritising fraud recovery and the use of civil sanctions. Developing capability and capacity to punish fraudsters. Collaborating with law enforcement.

The programme of work will be reviewed annually and approved by the Corporate Management Team.

- 4.2 The Corporate Management Team shall consider on an annual basis whether the level of resources invested in the programme of work is proportionate to the level of risk identified. They shall also determine how the success of the programme of work is to be measured.
- 4.3 The Corporate Fraud Manager shall submit an annual report to the Corporate Governance Committee that details the work that has been undertaken in the previous financial year against the programme of work and highlight all proven case of fraud and corruption by value and number.

- 4.4 The Internal Audit Service shall support the anti-fraud and corruption strategy by:
- Reviewing the implementation of this strategy and providing assurance on the adequacy of the Council's anti-fraud and corruption arrangements;
 - Evaluating the Council's reporting on counter fraud activities;
 - Evaluating the robustness of internal controls designed to prevent or detect fraud and corruption;
 - Reviewing the control weaknesses that contributed to a case of fraud, making recommendations for improvement;
 - Reviewing the fraud risk assessment and programme of counter fraud and corruption work;
 - Supporting the ethical and anti-fraud and corruption culture; and
 - Receiving whistleblowing referrals.

5. Disclosure, investigation and prosecution policies

- 5.1 The Council has a principle of zero tolerance to fraud and corruption. Everyone shall be dealt with equally and without favour.
- 5.2 Specific policies or procedures that deal with the issues of disclosure, investigation and prosecution shall be maintained and reviewed annually to ensure they reflect current best practice and legislative requirements, including the Regulation of Investigatory Powers Act 2000, Prevention of Social Housing Fraud Act 2013, Proceeds of Crime Act 2002, the Bribery Act 2010 and Money Laundering Regulations 2017.
- 5.3 Investigations into possible fraud and corrupt practices will be undertaken by the Corporate Fraud Team, who for investigatory purposes will have the right of access to all Members and employees and any information held by the Council. Members and employees will be required to co-operate fully with any investigation and appropriate disciplinary action will be taken if it is found that this is not the case. This requirement will be reflected in the Code of Financial Management.
- 5.4 Irrespective of who is involved, all matters of significant fraud or corruption identified or perpetrated against the Council, will be referred to the Police or any other regulatory body authorised to investigate such matters. The decision as to whether a matter is significant shall be determined by either the S151 Officer or the Monitoring Officer. The Chairman of the Corporate Governance Committee and the Council's external auditors shall also be informed of all matters of significant fraud and corruption.
- 5.5 If an employee has been involved in perpetrating a fraudulent or corrupt act, they shall be subject to the Council's disciplinary procedure. Where the allegation of an offence is proven then appropriate action shall be taken as set out in the disciplinary procedures.
- 5.6 If an employee has been involved in a significant fraud or corruption (see 5.4 above) the Council may continue to undertake disciplinary action against them,

irrespective of any decision reached as to whether or not there is to be a criminal prosecution. The Monitoring Officer shall make this decision.

- 5.7 The Council will aim to recover (from the perpetrators or its insurers) all losses that it sustains as a result of fraud and corruption.

6. Lessons to be Learnt

- 6.1 The Section 151 Officer and/or the Corporate Director(Service) are responsible for ensuring that lessons learnt from any investigation undertaken are considered and that internal control systems are amended accordingly. They shall also consider whether it would be of benefit to the Council to publicise the outcome of the investigation as a deterrent to others.

7. Publicising the Strategy

- 7.1 The Council will publicise the Anti -Fraud and Corruption Strategy both within and outside the Council.
- 7.2 The Council shall also comply with the requirements to publish information the relates to the delivery of this strategy in accordance with the Local Government Transparency Code.

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