

HUNTINGDONSHIRE DISTRICT COUNCIL

Anti Fraud and Corruption Strategy

1. Introduction

- 1.1 Huntingdonshire District Council is determined that a culture of honesty, openness and accountability will always be promoted, and as such is wholly opposed to all forms of fraud, corruption or theft. The Council is committed to making sure that the risk of fraud, corruption and theft is reduced to a level that is proportionate to the resources required to achieve that reduction. The Council also recognises that all dishonest acts undermine the high standards of public service that it is aiming to achieve.
- 1.2 This Anti-Fraud and Corruption Strategy provides details of our approach to tackling fraud, corruption and theft. It gathers together, under the heading of one overall document, all of the Authority's policies and guidance that deal with this area.

2. Anti-Fraud and Corruption Statement

- 2.1 The Council is committed to the highest possible standards of honesty, openness and accountability. The Council will not tolerate any fraud, corruption or theft by Members, employees, consultants, contractors or service users. It will ensure that internal procedures are in place to deter and prevent the risk of fraud, corruption or theft and maintain clear and well publicised arrangements for receiving and investigating complaints.
- 2.2 The Council will pursue appropriate action in all instances where fraud, corruption and theft are found.

3 Definitions

- 3.1 The Council defines fraud and corruption in the following way.

Fraud is defined as conduct where a person makes a false representation, deliberately fails to disclose information or abuses a position of trust, with the intention to make gain or cause a loss or the risk of a loss to another

Corruption covers the offering, giving, soliciting or acceptance of an inducement or rewards, which may influence the action of any person.

4 The Principles of Conduct

- 4.1 Each individual Member and employee is responsible for playing a part in ensuring that public confidence in the services provided by the Council is maintained. They will lead by example in ensuring compliance with all legal requirements, rules, procedures and practices, and conduct themselves in accordance with both the spirit and letter of their respective Codes of Conduct.

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5 Reducing the risk of fraud, corruption and theft

5.1 The Council has a number of procedures and rules to make sure that the risks associated with financial, administrative and organisational procedures are properly managed and controlled. The most important of these procedures and rules are the:

- Code of Financial Management
- Code of Procurement
- Code of Conduct for Members
- Code of Conduct for Employees
- Members' Planning Code of Good Practice
- Members' Licensing Code of Good Practice
- Staff Recruitment & Selection Process
- Risk Management Strategy

5.2 The Code of Financial Management makes it clear 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 the systems of internal control and ensure that relevant employees or Members are familiar with such systems.

6. Disclosure, investigation and prosecution policies

6.1 The Anti-Fraud and Corruption Strategy shall be supported by specific policies or procedures that deal with the issues of disclosure, investigation and prosecution. These policies and procedures are:

- The Whistle-blowing Policy
- The Whistle-blowing Guidance
- Money Laundering Avoidance Policy
- The Housing & Council Tax Benefit Anti-Fraud Strategy
- The Housing & Council Tax Benefit Prosecution Policy
- The Disciplinary Procedures

In addition to the above, detailed guidance notes have been written to assist staff who are required to undertake specific investigations.

6.2 The policies and procedures aim to ensure that the Council's commitment to the prevention of fraud, corruption and theft:

- is clearly defined
- actively encourages and promotes the prevention and detection of fraud, corruption and theft
- identifies clear reporting lines for those having knowledge or suspicion of irregularity
- establishes uniform procedures for handling allegations, ensuring consistent treatment
- ensures fair treatment for those against whom allegations are made
- encourages individuals and organisations that come into contact with the Council in the course of their business, joint working or partnerships, to recognise and where necessary, demonstrate appropriate mechanisms for the prevention and detection of fraud and corruption.

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- 6.3 Irrespective of who is involved, all matters of significant fraud and corruption identified against the Council, where its investigation is not covered by another policy or procedure, 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 the relevant Director.
- 6.4 Irrespective of the decision reached as to any criminal prosecution, the Council shall, in the case of an employee or employees, apply the disciplinary procedure and where the allegation of an offence is proven, take appropriate disciplinary action against the employee(s) involved.
- 6.5 The Council will aim to recover from the perpetrators any losses that it sustains as a result of fraud and corruption.
- 7. Corrective Action**
- 7.1 The Director of Commerce & Technology will be responsible for ensuring that lessons learnt from the investigation are evaluated and result in the strengthening of the systems involved. He/she shall also consider whether it would be of benefit to the Council to publicise the outcome of the investigation as a deterrent to other potential perpetrators.
- 8. Publicising the Strategy**
- 8.1 The Council will publicise the Anti-Fraud and Corruption Strategy and supporting policies to all Members and employees. Copies of documents referred to in this strategy shall be made available on the intranet.
- 8.2 Action will be taken to make the public and members of outside bodies aware of the Council's Anti-Fraud and Corruption Strategy.
- 9. Monitoring**
- 9.1 A Framework document will be prepared and completed to demonstrate how effectively this Strategy is being delivered.
- 10. Conclusion**
- 10.1 The Council is committed to tackling fraud, corruption and theft whenever it happens and any allegations received will be responded to in an effective and organised manner, following the principles and procedures within this document.
- 10.2 To ensure they remain effective the S151 Officer and the Monitoring Officer will annually review this Strategy, propose any changes to the Corporate Governance Panel and update the supporting Framework.