



South Cambridgeshire District Council

Anti-Theft, Fraud, Bribery & Corruption Policy and Procedures

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Introduction

1.1 The purpose of the Policy is to:

- encourage a counter fraud culture and proactive attitude to preventing, reporting and investigating, bribery, fraud, or corruption affecting South Cambridgeshire District Council (the Council); and,
- acknowledge the five principals of public sector fraud. (International Public Sector Fraud Forum, 2019)

1.2 In carrying out its functions and responsibilities, the Council wishes to provide assurance to all stakeholders that acts of theft, fraud, bribery, and corruption will not be tolerated by (the Council).

1.3 The Councils approved [Counter-Fraud and Error Strategy Statement \[PDF, 246 KB\]](#) should be read in conjunction with this policy. This document formalises the Council's approach to acts of theft, fraud, bribery and corruption, in accordance with the relevant provisions within the Local Government Act 2000; recognising the good practice guidelines in **the Fighting Fraud and Corruption Locally Plan 2020 and the Nolan Committee's 'Seven Principles of Public Life' (Annex B**

1.4 This document is intended to be considered alongside other council policies and should be read in conjunction with any relevant policies relating to theft, fraud, bribery, and corruption. (**Listed at Annex C**). The document sets out the Council's anti-theft, fraud, bribery and corruption policy as it relates to:

- The culture of the Council
- Colleagues
- Members
- Audit and Governance





- Redress and sanction
- Monitoring
- Systems; prevention, detection, and investigation.

The document will be issued as part of all induction processes for colleagues and also when new members join the Council.

Purpose

2. It is recognised that maintaining resilience to fraud and corruption is imperative to:
 - protect limited funds, resources and assets
 - provide value for money
 - promote the highest standards of conduct, performance and integrity from colleagues, contractors and elected members.
 - respond effectively to new threats and risks.

Definitions

Bribery

Offering, promising or giving a financial or other advantage to induce or reward improper performance or the request or receipt of such an advantage. It includes the corporate offence of failing to prevent bribery.





Corruption

Is the abuse of entrusted power for private benefit that usually breaches, regulations, standards or integrity and/or standards of professional behaviour.

Error

In the context of this strategy this is where the intent is not assessed to be fraudulent or cannot be proved to be fraudulent. It could be due to an organisation or third-party decision or action. However, error also results in losses to public funds.

Fraud

Defined in the Fraud Act 2006(1) and S11. (S.1) The Act gives a statutory definition of the criminal offence of fraud, defining it in three classes – fraud by false representation, fraud by failing to disclose information, and fraud by abuse of position.

S.11 of the Act makes it an offence for any person, by any dishonest act, to obtain services for which payment is required, with intent to avoid payment.

Fraud Prevention

To reduce the likelihood and/or reduce the impact of fraud. To create an anti-fraud culture in which people and processes work together to minimise fraud risk.





Fraud Risk Assessment

Is a process aimed at proactively identifying and addressing an organisation's vulnerabilities to both internal and external fraud. It is an essential element of effective counter fraud response and whilst it should be integrated into the organisation's overall risk management approach, it requires specific skills, knowledge, processes and products.

Risk

The possibility of an adverse event occurring, or a beneficial opportunity being missed. If realised, it may have an effect on the achievement of objectives and can be measured in terms of likelihood and impact.

Inherent Risk

Also defined as gross risk, is the risk to an organisation assuming there are no controls in place.

Risk Appetite

The amount of risk the organisation is willing to accept at the enterprise level, which manifests itself in the type and number of activities and associated risk that the organisation is willing to undertake.

Irregularity

- 3.7 Irregularities are instances of non-compliance with laws and regulations. It may be any significant matter or issue, other than fraud or corruption, which may warrant consideration or investigation.





An example may be where a member or colleague makes a genuine error or mistake during their duties/responsibilities, which is not disclosed, to the on-going detriment of the Council.

It may also involve inappropriate use of Council funds or assets, which may or may not constitute fraud, theft or corruption.

Policy Statement

4.1 The Council is committed to dealing with theft, fraud, bribery and corruption both inside and outside of the Council (the latter as far as it relates to the business of the Council) and adopts Public section Fraud Forum's Five Principals acknowledging that detection of fraud is a positive outcome. (International Public Sector Fraud Forum, 2019)

4.2 The Council acknowledges in approving this policy:

- It sets a standard to make it clear that bribery, theft, fraud, or corruption will not be tolerated.
- that the Council is committed to preventing and detecting bribery, theft, fraud, or corruption, and,
- that those perpetrating bribery, theft, fraud, or corruption may be subject to investigation, leading to consideration of civil action and/or criminal prosecution.
- Where necessary, work in cooperation with other organisations to prevent, detect and investigate suspected bribery, theft, fraud and corruption.

4.3 To implement this policy, the Council will:





- Provide a strategy containing guidance and signposting for users and investigation of bribery, theft, fraud, and corruption
- Investigate cases of bribery, internal and external fraud, theft, and corruption and take appropriate action (as it relates to council business)
- Ensure colleagues and members have the appropriate level of information and training to implement this policy
- Ensure information is provided to enable the public to report suspected cases of bribery, fraud, and corruption.

Commitment

- 5.1 The Council will maintain a suitably resourced, trained and qualified investigation team to detect and investigate fraud reports against South Cambridgeshire District Council. Investigation officers will be given authorisation under the scheme of delegations to investigate suspected offences of bribery, theft and fraud against the Council.
- 5.2 The Council will consider pursuing individuals or organisations who are suspected of having defrauded or committed corrupt acts against the business, and onward report them to the Police, if appropriate.
- 5.3 Members and colleagues will lead by example and ensure that they comply with all Council rules, regulations, instructions, and policies, reporting any errors or issues promptly.
- 5.4 The Council's commitment to dealing with theft, fraud, bribery, and corruption is demonstrated by having in place systems and procedures designed to limit, as far as possible, the opportunities to commit fraudulent acts and to enable any such acts to be detected at an early stage. The Council also has a





Whistleblowing Policy to encourage people to raise concerns and enable the Council to take appropriate action.

- 5.5 Allegations of theft, fraud and bribery and corruption will be investigated in a prompt, thorough and professional manner.
- 5.6 In accordance with recognised good practice, the Anti-Theft, Fraud, Bribery and Corruption Policy will be reviewed every two years by The Chief Finance Officer.
- 5.7 Social Housing Fraud and Council Tax support/reductions are potentially highest risk for attempted fraud by people outside the Council. **Annex E – Social Housing tenancy Fraud and Local Council Tax Support** sets out the Council’s particular provisions relating to this.

Responsibilities

- 5.8 Overall responsibility for dealing with theft, allegations of bribery, fraud, and corruption rests with the Council’s Chief Finance Officer, through statutory, “section 151” responsibilities and the Chief Executive.
- 5.9 Members and officers are encouraged to express concerns to the Chief Operating Officer, Chief Finance Officer, Monitoring Officer, Head of Internal Audit, Corporate Investigation Unit Manager (formally Corporate Fraud Manager) or any Service Manager in the knowledge that any statements will be treated seriously and in confidence. **(Annex G)**





Culture

- 6.1 The culture and tone of the authority is one of honesty and openness in all its dealings with opposition to theft, fraud, bribery, and corruption in any form. Members and colleagues play an important part in creating and maintaining this culture which supports our value to be 'accountable'.
- 6.2 The Council expects all suppliers, contractors, organisations, and individuals that it deals with to always act with honesty, integrity and in good faith. Those found to have committed offences risk having their contract terminated and may be prevented from tendering for future contracts with the Authority. An investigation will be undertaken, and prosecution and/or civil proceedings will be considered. The Council will in turn ensure that all its dealings will be on the same basis.
- 6.3 Officers will be encouraged to participate in local and national professional groups to exchange information, initiatives, and ideas, some of which will have fraud and corruption implications.
- 6.4 The Council's external auditors examine annually the Council's arrangements for the prevention, detection and investigation of theft, fraud, bribery, and corruption and will report major deficiencies and concerns.

Raising Concerns

- 7.1 Colleagues must raise any concerns about any issue or suspicion of fraud, theft, bribery or corruption at the earliest possible stage or matters that concern the Council's method of operation. Concerns will be treated seriously and confidentially.





- 7.2 Colleagues can report the matter to their line manager, Chief Operating Officer, Chief Finance Officer, Monitoring Officer, Head of Internal Audit or Corporate Investigation Unit Manager. This will help us to promptly investigate the concern and review internal controls to prevent any further risk.
- 7.3 When raising concerns, colleagues and members can be assured that confidences will be respected. Any allegation of theft, fraud, bribery, and corruption will be dealt with in a thorough, professional and impartial manner. The Corporate Investigation Unit Manager will liaise with HR to ensure the disciplinary process is initiated if necessary.
- 7.4 Members of the public, organisations, Council suppliers and contractors are responsible for raising any issues that concern them through the channels listed above.
- 7.5 Issues of concern can be reported via the Council's Whistleblowing Policy. If they involve theft, fraud, bribery, or corruption they will be considered according to the provisions of this policy.
- 7.6 A copy of the Whistleblowing Policy is available on the Council's intranet with other related documents and associated guidance. This includes how to report anonymously and the contact details of Protect, (a whistleblowing charity that offers free, confidential advice to people concerned about crime, danger or wrongdoing at work).

Colleagues

- 8.1 The recruitment and retention of high calibre colleagues is vital if the Council is to deliver quality services. The Council will take steps at the recruitment stage

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to establish, as far as possible, the honesty and integrity of potential colleagues.

- 8.2 Recruitment will be in accordance with the Council's Recruitment and Selection procedures and Disclosure and Barring (DBS) (formally CRB) policy.
- 8.3 Colleagues are bound by the Officer Code of Conduct, Contract Regulations and Financial Regulations, conditions of service and departmental codes of conduct. Note should be taken of the Council's position on the giving or receipt of gifts and/or hospitality. Colleagues are also bound by codes issued by relevant professional bodies of which they are members where these are relevant to the officer's role within the Council. The Council has a comprehensive gifts and hospitality policy. Colleagues and Members should read the policy and where they are offered gifts or hospitality refer to the policy before acceptance, noting that whether they accept, or decline it is their individual responsibility to report the offer.
- 8.4 Colleagues must operate within Section 117 of the Local Government Act 1972, to give notice in writing of financial interests in contracts relating to the Council, or the offer of any fees or rewards other than their proper remuneration. Failure is a criminal offence under s.117(3). The Council may take steps to detect any undeclared interests.
- 8.5 The role of colleagues in the Council's systems and procedures will be as laid down in Contract Regulations and Financial Regulations, job descriptions, departmental instructions and any applicable procedural manuals.

The Council recognises the importance of training in the delivery of high-quality services. Colleagues are required to undertake mandatory Anti -Theft,





Fraud and Corruption training when they join the authority (Fighting Fraud in Local Government) in addition to internal training delivered by the Corporate Investigations Unit.

All new colleagues will receive basic training on fraud identification and reporting, particularly with regard to prevention of social housing fraud and council tax support/discount fraud.

Members

9.1 Members are required to operate within:

- The Council Constitution,
- Government legislation,
- the Members' Code of Conduct,
- the Protocol on Member-Officer Relations,
- the Council's Contract Regulations /Financial Regulation,
- the Procedural Guidance for Planning and Licensing.

9.2 The above matters are specifically addressed in the Member Toolkit. All Members are required by the Localism Act 2011 to register pecuniary and other interests to the Monitoring Officer and to keep that information up to date.

9.3 These matters listed above are supported by briefings received by new Members after election. - This responsibility belongs to Democratic Services.

9.4 **The Chief Finance Officer has** responsibility for:

- risk management issues and making any recommendations therein;
- the overview of the Council's Whistleblowing Policy;
- the overview of the Council's Anti-Theft, Fraud and Corruption Policy;





Processes

- 10.1 The Council has Financial Regulations and Contract Regulations in place that give members and colleagues clear instructions, or guidance, as to carrying out the Council's functions and responsibilities. The contents of these documents should be brought to the attention of all colleagues.
- 10.2 The Chief Finance Officer has a statutory duty under Section 151 of the Local Government Act 1972 to ensure that there are proper arrangements in place to administer the Council's financial affairs and safeguard Council assets.
- 10.3 The Internal Audit planning process incorporates a risk-based approach to planning audits, which considers the risk of fraud. This will help in determining the frequency of audits and the areas to focus attention on.
- 10.4 All the Council's systems will incorporate, as far as is practicable, efficient and effective internal controls. The adequacy, appropriateness and effectiveness of internal controls will be independently reviewed by Internal Audit as part of their programme of work. Any weaknesses identified in internal control will be reported to heads of service whose duty it will be to address and respond to all the issues raised.

Fraud Risk Assessment (FRA)

- 11.1 The Council will maintain an Organisational Fraud Risk Assessment document to effectively identify, describe and assess individual fraud risks. Full fraud risk assessments will be completed, according to business priorities. The FRA will, in time, include evaluation of mitigating controls, including understanding their limitations to proactively identify the Council's vulnerabilities to both internal and external fraud. To support the FRA, Heads of Service shall ensure that fraud prevention and detection is built-in to the design of any Council procedure or

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system (including digital services) so that integrity is maintained through system and procedural design. Such controls need to be effective and appropriate, and proportionate for the procedure or system. During the design phase of any new process or major spend, risk owners, should conduct an Initial Fraud Risk Impact Assessment and provide this to the Corporate Investigation Unit.

Prevention, detection and investigation

- 12.1 The Council's systems should, where possible, incorporate internal control features that are designed such that theft, fraud, bribery and corruption should not be possible without collusion.
- 12.2 Where achievable, there should be a division of duties between tasks. For example, when raising a purchase order, a requisition is raised by a requisitioner, and a separate authorised officer provides approval.
- 12.3 It is acknowledged that controls and processes operated will not eradicate fraud and error in systems. Dishonest acts can still be committed and agreed procedures circumvented. (International Public Fraud Forum).
- 12.4 The Council's Financial Regulations place a responsibility on certain officers to notify the Chief Finance Officer immediately of any irregularity or suspected irregularity.
- 12.5 The Chief Finance Officer will decide the initial action to be taken and determine the most appropriate person to undertake it (e.g. Internal Audit, the Corporate Investigations Unit Manager, or another suitably trained person). In exceptional circumstances, where an allegation involves the Chief Finance





Officer, the Chief Operating Officer will assume this role. In any event Internal Audit will be notified in all instances where fraud is suspected.

- 12.6 Depending upon the nature of any irregularity, Internal Audit/the Corporate Fraud Manager will work closely with management and other agencies, such as the Police, to ensure that all matters are investigated thoroughly and reported upon.
- 12.7 The Council will participate in the (mandatory) Cabinet Office National Fraud Initiative to share data for the purposes of detecting fraud and error and any local data matching exercises approved by Leadership Team.

Awareness and Training

- 13.1 The Council mandates Anti-Theft, Fraud, Bribery and Corruption training for Members and colleagues to ensure that their responsibilities and duties are clear, and their understanding reinforced. Mandatory training is monitored by People Team and refresher training is set for officers to maintain awareness.
- 13.2 The Procurement Team will act to ensure that those organisations that work with the Council to deliver services are made aware of the Council's Anti-Theft, Fraud, Bribery and Corruption policy and process, including their Whistleblowing Policy and process to report suspicions.

Redress and sanction

- 14.1 If the investigation indicates improper behaviour by a colleague or member, The Corporate Investigation Unit may investigate allegations and/or initiate the Council's Disciplinary Policy and Procedure. The Council will involve the Police





where serious and/or organised fraudulent or corrupt acts are discovered. This will be a matter for the Chief Finance Officer to decide in consultation with other relevant parties. Where fraud is found it will constitute as Gross Misconduct, as defined within the Council’s Disciplinary Policy, and result in dismissal.

- 14.2 If the investigation suggests improper behaviour by a member, the procedures of the Council’s Constitution, including relevant Codes or Protocols, will be followed.
- 14.3 If the investigation reveals theft, fraud, bribery or corruption by another person or organisation, the Council will take whatever remedial action it considers relevant to the circumstances, including instigating criminal or civil legal proceedings where appropriate.

Monitoring

Who
Leadership Team and Chief Finance Officer (S151 Officer)
Audit and Corporate Governance Committee
Head of Internal Audit
Corporate Investigation Unit Manager

- 15.1 The Policy will be monitored, reviewed and revised by stakeholders of the Council.

The Policy will be reported to the Audit and Corporate Governance Committee periodically to highlight developments and changes.





Progress against the policy and updates will be noted in the annual report to the Committee.

Annex

Annex A – Fighting Fraud Locally

Fighting Fraud and Corruption Locally 2020 is the updated counter fraud and corruption strategy for local government. It provides a blueprint for a coordinated response to fraud and corruption perpetrated against local authorities with the support of those at the top.

Annex B – Nolan Committee

The Seven Principles of Public Life are the basis of the ethical standards expected of public office holders. They apply to both colleagues and members and are included in our Local Code of Governance.

Selflessness	Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
Integrity	Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.





Objectivity	In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards or benefits, holders of public office should make choices on merit.
Accountability	Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
Openness	Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
Honesty	Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
Leadership	Holders of public office should promote and support these principles by leadership and example.

Annex C – Related policies

- Enforcement and Inspection Policy
- Whistleblowing Policy
- Recruitment & Selection Procedures





- Disclosure and Barring Service (DBS) (formally CRB) Policy
- Contract Regulations
- Financial Regulations
- Officer Code of Conduct
- Member Code of Conduct
- Disciplinary Policy & Procedure
- Protocol on Member – Officer Relations
- Procedural Guidance for Planning and Licensing
- Member Toolkit
- Disclosure Policy
- [Ethical%20Handbook.pdf \(moderngov.co.uk\)](#)

Annex D – Social Housing Tenancy Fraud

What is social housing tenancy fraud?

Social housing can provide a lifeline to people and families when they are most in need.

Most people applying for housing keep to the rules and follow the conditions of their tenancy. However, some do try to cheat the system for their own benefit.

Tenancy fraud is not a victimless crime.

When this occurs, it uses up valuable housing and can deprive those in genuine need. It also means that the Council could have to spend additional money and resources to provide temporary accommodation to those genuine applicants.

The Council is committed to the prevention and detection of tenancy fraud. Ensuring fair allocation of social housing to those that are in the greatest need.





Examples of tenancy fraud include (*but are not limited to*):

- Obtaining a social housing tenancy by misrepresentation of identity or personal circumstances.
- Making a false statement or withholding information when making an application as a homeless person.
- Suspected unlawful sub-letting, including:
 - Sub-letting the whole property to a family member, a single household or multiple sub-lets within one property.
 - Sub-letting part of the property to an unauthorised person(s)
- Wrongly claimed succession - retention of a tenancy following the death or vacation from the property of the tenant, following a previous succession or of a non-qualifying person.
- Unauthorised assignment of the tenancy.
- 'Key selling' - this is where the tenant leaves a property and passes on the keys to someone else in return for a one-off lump sum payment or favour.
- Unauthorised mutual exchanges and providing false information to complete a mutual exchange.
- Purchasing a socially rented home under the 'Right to Buy' by misrepresentation of identity or personal circumstances.

Our approach

Our approach will focus on preventing fraud from occurring **where possible**. We are committed to having robust systems and procedures in place, that are designed to limit opportunities and prevent/detect fraudulent acts at an early stage.

Preventative measures will include verifying information provided by the applicant on applying for social housing, making a homeless application or when signing up to a

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new tenancy. This will include checking forms of identification provided by the applicant, their tenancy history, and their household circumstances.

Information about the rights and responsibilities around occupation will be provided to every new Council tenant upon sign-up of their tenancy. New tenants will also have a photograph taken when moving in. Follow up visits with new tenants will be carried out to check that all correct persons have taken up occupancy.

We will also use a range of publicity methods to raise awareness of tenancy fraud amongst our residents, the public and partner agencies.

The Council will participate in data and intelligence analysis exercises hosted by the National Fraud Initiative, Locta, and Housing Benefit Matching Service and seek opportunities to participate or facilitate local data matching exercises to detect fraud and error across directorates and cross-border localities. Where the law allows, the business will share information to facilitate the swift detection of fraud. As well as participating in national exercises, SCDC is willing to participate and lead in local initiatives to produce improved quality data sets and intelligence.

Action

All suspected cases of tenancy fraud are referred to the Corporate Investigation Unit for investigation.

We will take a balanced and proportionate approach to tackling social housing tenancy fraud. We will consider a range of factors in deciding the most appropriate action to take in each instance.





If the investigation reveals evidence of fraudulent activity, the Council will take the appropriate remedial action that it considers relevant to the circumstances. This may include instigating civil or criminal legal proceedings, where appropriate, that could result in one or more sanctions, such as: property possession/eviction, tenancy demotion, refusal of an application, action for damages, a penalty, an injunction, recovery of proceeds of crime.

Supporting sub-tenants

If a sub-tenant is discovered during an investigation who is deemed eligible for housing, the Council will support the household by offering advice and assistance, which may be in the form of completing a homeless application if applicable and applying to the Home-Link Choice Based Lettings Scheme. We will advise them of the legal process the Council will take in reclaiming the property so that they are aware of the time scale involved for them to vacate the property.

More information

More information on housing fraud can be found on our [website](#), and any suspected fraud can be reported to us via our <https://reportafraud.co.uk/southcamb>.

Annex E - Local Council Tax Support

The Council shall make provisions to prevent, detect and punish instances of fraud committed against Council Tax Support and discount Fraud.





A robust verification process will be operated in accordance with national guidelines to verify the identity of claimants and eligibility to benefits.

The facility to report suspicions of fraud will be made available through the Council's website. Fraud can also be reported confidentially over the telephone to Customer Services.

Any employee with concerns about a potential benefit fraud may speak in confidence to the Corporate Investigations Unit Manager or the Revenues and Benefits Manager.

The Council will enter into a Joint Working Agreement with the Department for Works and Pensions, and work jointly with other local authorities, the police and other agencies to investigate and prevent fraud.

The Council will refer to relevant Corporate Policies to ensure that action is taken and is proportionate and consistent, according to the Public Interest Test.

The names and address of those individuals convicted of fraud will be publicised where it is considered to be in the public interest. In particular where the publication will serve as a deterrent to others either engaged in or considering a similar course of conduct, or where it will raise public awareness of fraud and the mechanisms for reporting suspicions.

The Investigations Unit Manager will make regular reports of the Council's counter fraud performance to the lead member for Finance.





The Council will participate in data matching through the Housing Benefit Matching Service and National Fraud Initiative and will subscribe to the National Anti-Fraud Network.

Annex F – Bribery Risk

The Bribery Act 2010 came into force on 1 July 2011 and places additional requirements on ‘commercial organisations’. Whilst the Council is not a ‘commercial organisation’ in terms of its normal local authority activities, guidance issued by the Chartered Institute of Public Finance & Accountancy (CIPFA) and the National Crime Agency (NCA) states that a court would view a local authority as a relevant organisation for the purposes of the Act. It is important therefore that the Council should have regard to the principles of the Act in the conduct of its activities and its policies and procedures, to ensure that it does not fall foul of the legislation.

The Bribery Act 2010 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 new separate offence of bribing a foreign public official. Additionally, s.4 of the Fraud Act creates the offences of fraud by abuse of position. There is also a corporate offence under Section 7 Bribery Act of failure by a commercial organisation to prevent bribery.

Our Officers’ Code of Conduct explains that the Bribery Act 2010 replaces the offences at common law and the Prevention of Corruption Acts with two general offences and prohibits the offering, giving, soliciting and acceptance of money or other advantage in order to induce or reward the improper performance of public and other functions.





The Act extends to all persons associated with the Council, including colleagues at all levels and grades, those permanently employed and temporary agency colleagues; Members (including co-opted or external Members); suppliers; contractors; partners; volunteers and consultants.

The first offence covers the offering, promising or giving of an advantage (broadly, offences of bribing another person).

The second deals with the requesting, agreeing to receive or accepting of an advantage (broadly, offences of being bribed).

Bribery is a criminal offence. The Council does not, and will not pay, offer, or request bribes to anyone for any purpose, nor does it or will it accept or receive bribes or improper inducements from anyone for any purpose. To use a third party to channel bribes to others is also a criminal offence.

The Council is committed to the prevention, deterrence and detection of bribery and will take action against those found participating in acts of bribery. There is an expectation and requirement that all individuals and organisations associated in whatever way with the Council will act with honesty and integrity and that Council colleagues at all levels, and members, will lead by example in these matters.

Areas of the Council's business that could be exposed to the inherent risk of bribery include:

- Procuring of supplies, goods, or services.
- Awarding concessions, grants, and licenses.
- Approving planning applications.
- Selling or letting commercial properties.





- Cancelling liabilities (e.g., business rates, debtors).
- Allocating housing.
- Recruiting colleagues.
- Determining the course of enforcement action.

This is not an exhaustive list but sets out some of the areas where there may be a risk of bribery arising.

This Policy does not change the Council's policy on gifts & hospitality, which is set out in the Officers' Code of Conduct.

Annex G - Responsibilities

S.151 Officer	Responsibility for overseeing the delivery of the counter fraud strategy. Resolve disputes over implementation of fraud recommendations.
Audit & Corporate Governance Committee	Responsible for ensuring that the Council has a robust counter-fraud culture backed by well designed and implemented controls and procedures which define the roles of management and Internal Audit; and, that the Council monitors the implementation of the relevant policy. Will review the assessment of fraud risks and potential harm to the Council from fraud and corruption, and monitor the counter-fraud strategy, activities and resources.





Corporate Investigation Unit (formally Corporate Fraud Team).	<p>Responsible for investigating cases of suspected fraud professionally and promptly, within legal framework, and for, maintaining requisite knowledge and skills to deliver an effective service.</p> <p>To maintain case management records effectively and provide quarterly report to Audit and Governance Committee on performance.</p> <p>Work with stakeholders to deliver effective service and improve corporate response to bad actors.</p>
Heads of Service	<p>Responsible for ensuring that recommendations made to prevent fraud are fully considered and implemented, where agreed, by managers. Where a recommendation is not accepted a rationale for the decision should be recorded in writing and returned to the Corporate Investigation Unit Manager and Internal Audit.</p>
Service Managers	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>Responsibility for implementing robust internal controls and security measures and for ensuring that staff adhere to agreed processes when administering public funds and assets on behalf of the Council.</p>





	<p>Assessment of adequacy, appropriateness and effectiveness of internal controls.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the Council or colleagues should be reported to the Chief Finance Officer.</p> <p>Responsible for ensuring counter fraud staff are given unhindered access to colleagues, information and other resources as required for investigation purposes.</p> <p>Responsibility to collaborate with the Corporate Investigation Unit to complete and to update the Organisational Fraud Risk Assessment and further conduct full fraud risk assessments over new and revised processes/schemes.</p>
Internal Audit	<p>Independently monitor controls as part of their programme of work.</p> <p>Conduct Investigation into bribery and corruption.</p>
Colleagues	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the</p>





	<p>Council or colleagues should be reported to the Chief Finance Officer.</p> <p>Responsibility to collaborate with the Corporate Investigation Unit to complete and to update the Organisational Fraud Risk Assessment and further conduct full fraud risk assessments over new and revised processes/schemes.</p> <p>Responsibility for considering the risk of fraud and abuse within their respective service area and to participate to review control measures and report where risk is deemed to exceed an acceptable level ('risk appetite') to Managers.</p> <p>Responsibility to maintain records in relation to day-to-day business processes, subject to meeting the requirements of the Data Protection Act and subsequent regulations relating to record retention.</p>
Members	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the Council or colleagues should be reported to the Chief Finance Officer.</p>





Contractors	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the Council or colleagues should be reported to the Chief Finance Officer.</p>
People Team	<p>Responsibility for ensuring the suitability of all employees to undertake work on behalf of the Council.</p> <p>Responsibility for overseeing staff wellbeing and staff assistance programmes which may assist to reduce the threat from insider attacks.</p>
3CICT	<p>Information Technology Services maintain responsibility for cyber security throughout the business. It is recognised that data has become a valuable commodity for criminals wishing to commit fraud, with increased attacks from phishing attempts. 3C ICT operate practices to protect council systems from attacks and raise awareness to staff to improve and maintain cyber security within council systems.</p>

