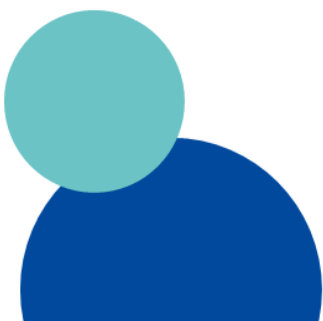




Waverley Borough Council
Counter Fraud Policy

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Approval & Publication:

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V7.1	Draft	13/04/2022	Bi-annual Revision of the document	GB
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V8	Published			

Impact Assessments and Consideration:

Impact Assessment Type	Required / Not Required	Date Completed	Impact Assessments and Considerations Comment	Assessment Owner
Equality Impact Assessment			Everyone will be treated equally in accordance with the law and the contents of the agreed councils fraud related policies	
Health in all Policies	NR			
Data Protection Impact Assessment			Information obtained will be treated in accordance with legal requirements.	
Climate Change	NR			

Contents

- 1. Introduction**
- 2. Policy Statement**
- 3. Strategic Approach to Fraud**
- 4. Council Promises**
- 5. Outcomes and Priorities**
- 6. Links to other Corporate Policies or relevant external/ legal documents**

1. Introduction

The council recognises that detected fraud and corruption in local authorities is increasing and that has a statutory duty to minimise the risk of fraud and where possible prevent fraud and corruption occurring in the authority.

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. The strategy outlines a governance framework that can for continued national and great regional collaboration on counter fraud under the fighting fraud and corruption locally umbrella. Aligning our own policy and strategy to this framework supports the development and maintenance of a culture in which fraud and corruption are unacceptable.

The aim of this policy and other antifraud measures put in place by the council is to develop and embed strong antifraud culture. This not only acts as a deterrent to potential perpetrators of such activity it will also assist the council and protecting vital services and managing its resources effectively.

As always be a small minority who consider fraud to be acceptable, the council put in place appropriate measures to prevent fraud from entering the system, but when it does occur, the council will act swiftly to detect, investigate and punish those going to have been involved in fraudulent activity. The council will utilise all available criminal civil regulatory and disciplinary sanctions and will seek to recover all losses where this is considered to be in the public interest and taking account of the resources available.

This policy applies to all:

- members and employees of the council
- agency workers and consultants engaged by the council
- the council's agents, partners, suppliers and contractors supplying goods or services to the council, or performing work and/or delivering services on behalf of the council
- members of the public in use of council services

there are three ways the council can discharge this duty. These are by making all members, employees and the public:

- i. aware of the council's views on fraud and corruption;
- ii. aware of their personal responsibilities in relation to the conduct;
- iii. aware of what action they should take if you become aware of fraud or corruption.

This policy document covers i), while the 'Fraud Response Plan' has been developed to cover ii) and iii) above

this policy supports the local code of corporate governance and promoting the values of good governance through the upholding of high standards of conduct and behaviour.

2. Policy Statement

The council is committed to the prevention and detection of fraud, bribery and/or corruption and associated activities whether it is perpetuated against or arises from within the council in order to protect public funds. Where fraud, bribery and/or corruption is suspected or identified the council will commission an investigation and take all reasonable steps to recover losses.

The council will use sanctions where the need is identified. This may include informing the police to pursue a prosecution (wherever relevant), and/or the use of disciplinary action against employees where fraud bribery and/or corruption is suspected or identified, whilst treating each case on its own merits and taking account of the public interest.

3. Strategic approach to fraud

One of the basic principles in the management of public sector organisations is to ensure the proper use of public funds. It is, therefore, important that all those who work in the public sector are aware of the risks of fraud, bribery, corruption and/or money laundering, along with the measures and its detection and prevention.

This policy sets out the council's position in respect of fraud, bribery and/or corruption, along with associated activities, involving dishonesty such as money laundering, tax avoidance and is applicable to all aspects of the council's business, employees, contractors and any person or organisation doing business with the council.

The council use of sanctions will be governed by this policy and the principles of the policy shall apply equally to any fraud against the council or against funds for which the council has responsibility. The council will not accept abuse of either its services or resources. Fraud, corruption and theft whether committed by staff (paid and volunteers), elected members, contractors, agents and/or other third parties will not be tolerated. All persons under suspicion will be treated fairly. This means that so far as it may be reasonable and/or appropriate to do so, the council will look to strike the right balance between preservation of personal rights and freedoms and the public interest need, to ensure justice which is achieved in any given case.

The council's fraud response plan, supports this policy provides further details on:

- definitions of fraud, bribery, corruption and money laundering
- what criminal offences relate to fraud, bribery, corruption and money laundering
- the council's approach to ensure adequate procedures in place to mitigate the risks
- general roles and responsibilities

- an overview of relevant contacts for advice or reporting concerns
- the range of sanctions available to the council as a deterrent fraud, bribery and associated offences

This policy is underpinned by a strategy that sets out how this policy will be implemented and delivered, with specific reference to the outcomes and priorities identified in this policy.

4. Council’s Corporate Priorities

Waverley Borough Council is committed to improving the lives of the residents and creating opportunity and prosperity for local people and businesses.

The delivery of the council’s vision through its corporate plan 2020 to 2025 is governed by the following priorities, including:

Corporate Priorities	
✓	Local, open, participative government
✓	Supporting a strong, resilient local economy
✓	Taking action on Climate Emergency and protecting the environment
✓	Good quality housing for all income levels and age groups
✓	Effective strategic planning and development management to meet the needs of our communities
✓	Improving the health and wellbeing of our residents and communities

5. Outcomes

This policy seeks to achieve the following Outcome:

Outcome - a zero tolerance to fraud, bribery, corruption and money laundering, with early detection and prompt investigation of fraud, bribery, corruption and money-laundering, thereby engendering confidence and trust in the governance arrangements of the council.

Strategy Action 1. – To promote to counter fraud culture and engage employees in combating fraud

Strategy Action 2. – Ensuring robust mechanisms for preventing, measuring and reporting on fraud

Strategy Action 3. – Assessment of fraud risk identification of the area’s most vulnerable to fraud

Strategy Action 4. – Sharing good practice to combat fraud

6. Links to other Corporate Policies or relevant external/legal documents

This policy should be read in conjunction with:

1. Counter Fraud Strategy
2. Fraud Response Plan
3. Anti-Money Laundering Policy
4. Whistleblowing Policy
5. Anti Bribery Policy

Many service areas within the council have statutory, regulatory or other enforcement powers in place and have their own service specific policies that focus on those specific operational considerations. These policies complement this policy, providing detailed operational context specific to the enforcement remit of the relevant services to which they relate. In the event, however, that conflict may arise, clarification should be sought from the Council’s Borough Solicitor.