



~~TAMWORTH BOROUGH COUNCIL~~

~~Anti-Fraud and Corruption Strategy & Guidance Notes~~

~~Revised February 2009~~

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COUNTER FRAUD AND CORRUPTION POLICY STATEMENT,
STRATEGY & GUIDANCE NOTES

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Distribution

The document will be available on the [Intranet and the website](#).

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TAMWORTH BOROUGH COUNCIL

ANTI-FRAUD AND CORRUPTION STRATEGY COUNTER FRAUD AND CORRUPTION POLICY STATEMENT

1.0 Introduction

1.1 Tamworth Borough Council fully recognises its responsibility in relation to the spending of public money (Protecting the Public Purse) and is committed to the fullest support for membersCouncillors and staffEmployees in upholding the reputation of the Council and maintaining public confidence in its integrity. It also recognises its responsibilities under the Proceeds of Crime Act 2002 and Money Laundering Regulations 2007 and the Bribery Act 2010.

1.2.0 ~~The culture and procedures of the Council are intended to ensure that high standards in public life apply throughout the Authority and support the authority's priority "working with others, we will actively tackle the cause and impact of crime and anti-social behaviour". The Council is aware of the importance of ensuring that members and staff are fully aware of their personal responsibilities. The authority has a range of interrelated policies and procedures that provide a corporate framework to counter fraudulent activity. These have been formulated in line with appropriate legislative requirements and include: The Council is committed to maintaining an ethical culture which does not and will not tolerate any form of fraud and corruption. Any such issues will be thoroughly investigated and, if confirmed, dealt with rapidly in the strongest possible way. We will seek the strongest possible sanctions against those who seek to defraud the Council. This includes taking appropriate action against employees, Councillors, contractors, external individuals and organisations.~~

3.0 To deliver the Council's corporate priorities, aims and strategic objectives we need to maximise the financial resources available to us. In order to do this we must reduce the risk of fraud to an absolute minimum.

4.0 This Policy Statement, together with the Counter Fraud & Corruption Strategy and Guidance Notes, is intended to provide advice and information to Employees and Councillors but suppliers, contractors and the general public are also encouraged to use this advice and guidance.

COUNTER FRAUD AND CORRUPTION STRATEGY

1.0 Introduction

1.1 This strategy is a key element of the Council's overall corporate governance arrangements which aim to ensure the Council is well managed and does the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable way. The Council has a range of other interrelated policies and procedures that provide a corporate framework to counter fraud activity. These have been formulated in line with appropriate legislative requirements and include:

- Standing Orders & Financial Regulations,
- National Code of Local Government Conduct,
- Whistleblowing Policy,
- Accounting procedures and records₁,
- Sound internal control systems,
- Effective Internal Audit,
- Effective recruitment & selection procedures,
- Disciplinary procedures,
- Fraud response plan,
- Benefits Prosecution Policy,
- ~~Confidential reporting policy~~
- Data Protection Policy₁,
- IT Security Policy₁,
- Personnel Security Policy₁,
- Physical Security Policy₁,
- ~~Employees Handbook~~
- Constitution₁,
- Scheme of Delegation₁,
- Members handbook₁,
- Code of Corporate Governance,
- Gifts & Hospitality Policy & Register,
- Anti-money Laundering Policy and Guidance,
- Conflict of Interests Policy,
- Other council procedures as appropriate₁,
- Any relevant professional Codes of Ethics or obligations₁.

1.2 All references to fraud within this document include any type of fraud-related offence. Fraud, theft, bribery and corruption are defined as follows:

Fraud – “the intention to make gain or cause loss by false representation, failing to disclose information or abuse of position”.

The Fraud Act 2006

Theft – “ a person shall be guilty of theft if he/she dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it”. The Theft Act 1968.

Bribery – “A person (“P”) is guilty of an offence if either of the following cases applies.

Case 1 is where—

(a)P offers, promises or gives a financial or other advantage to another person, and

(b)P intends the advantage—

(i)to induce a person to perform improperly a relevant function or activity, or

(ii)to reward a person for the improper performance of such a function or activity.

(3)Case 2 is where—

(a)P offers, promises or gives a financial or other advantage to another person, and

(b)P knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity. (The Bribery Act 2010)

Corruption - “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.” (Fraud Audit Manual, the Audit Commission)

1.3 A dishonest act or fraudulent activity may be, but is not limited to, an act or activity that is unethical, improper, or illegal such as:

theft of an asset including, but not limited to, money, tangible property, intellectual property etc;

misappropriation, misapplication, destruction, removal, or concealment of property;

false claims and/or misrepresentation of facts;

alteration or falsification of paper or electronic documents, including the inappropriate destruction of paper or electronic documents;

inappropriate use of computer systems including hacking and software

piracy;

embezzlement;

bribery, or corruption of any kind;

unlawful or undeclared conflict of interest;

unauthorised use or misuse of Council property, equipment, materials or records;

1.4 Although a dishonest or fraudulent act may have criminal and/or civil law consequences, the Council is not required to use a determination by a criminal or civil body as the basis for determining whether an act is dishonest or fraudulent, nor must the act rise to the level of a crime or violation of civil law in order to constitute a violation of the Council's Conduct and Capability Policy.

1.53 The Council also expects that individuals and organisations (e.g. partners, suppliers/contractors and service users) which it comes into contact with, will act towards the Council with integrity and without ~~thought or~~ actions involving fraud or corruption. The Council in turn will endeavour to ensure that all of its dealings will be on the same basis.

1.64 In administering its aims and responsibilities the Council is totally committed to deterring fraud and corruption, whether it is attempted on or from within the Council, and is committed to an effective anti-counter fraud and corruption strategy designed to:

- limit, as far as possible, the opportunities to commit fraudulent acts - **prevention**,
- enable any such acts to be **detected** at an early stage, and
- deal with any subsequent **investigations** in a prompt, thorough and professional manner.

1.75 Overall responsibility for dealing with fraud and corruption rests with the ~~Corporate Director of Resources~~Executive Director Corporate Services, who is the nominated Section 151 Officer having 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. He is therefore the principal contact for all ~~Members~~Councillors and ~~staff~~employees.

1.86 Internal scrutiny of the Council's various activities occurs as a result of:-

- the ~~Corporate Director of Resources~~ Executive Director Corporate Services Section 151 responsibilities and Section 114 Local Government Finance Act 1988 responsibilities,
- the establishment of sound Internal Audit arrangements in accordance with the Accounts and Audit Regulations 2006~~11~~, and
- the responsibilities placed on the Monitoring Officer under Section 5 of the Local Government and Housing Act 1989.

1.97 External scrutiny of the Council's various activities occurs as a result of involvement by:-

- Local Government Ombudsman,
- External Auditor,
- ~~Audit Commission,~~
- Central Government Departments and Parliamentary Committees,
- HM Revenues and Customs,
- The Department for Work and Pensions
- The ~~G~~general ~~P~~public.
- ~~Inspectorates — such as the Benefit Fraud Inspectorate.~~

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1.108 This Anti-Counter Fraud and Corruption Strategy is based on a series of comprehensive and inter-related procedures designed to deter any attempted fraudulent or corrupt act. These cover:-

- Culture, ~~section 2.0,~~
- Prevention, ~~section 3.0,~~
- Detection and ~~i~~nvestigation, ~~section 4.0,~~
- ~~Recovery, Sanction and Redress,~~
- Training ~~and Awareness,~~ ~~section 5.0,~~ and
- ~~Sharing Information,~~
- ~~Implementing the Strategy.6.0.~~

2.0 Objectives

2.1 The key objectives of this Counter Fraud and Corruption Strategy are to:

Increase awareness of the counter-fraud responsibilities at all levels within and outside the Council;

Further embed and support the effective management of fraud risk within the Council;

Support counter-fraud activities across the Council;

Minimise the likelihood and extent of loss through fraud and corruption.

2.12.2 All of the above will directly support the achievement of the Council priorities whilst ensuring that statutory responsibilities are met.

3.0 Roles and Responsibilities

3.1 Roles and responsibilities for identifying and mitigating against the risk of fraud must be clearly understood and embraced effectively.

3.2 The risk of fraud and corruption is considered in the Council's corporate risk management arrangements. Chief Officers must therefore ensure that:

Their risk register accurately reflects the risk of fraud and corruption including any emerging risks;

Controls, including those in a computerised environment and for new systems and procedures, are effective and are properly maintained and documented;

There is compliance with the Council's Financial Regulations and associated guidance, Standing Orders and any other relevant codes of practice;

Those engaged in countering fraud and corruption, have the appropriate authority, skills and knowledge to undertake this work effectively;

That the necessary framework agreements to counter fraud are in place where the Council is working with other organisations either by way of contract or partnership. The Council will not knowingly enter into any contractual agreement with an organisation that fails to comply with its Code of Practice and/or other related procedures.

Findings from fraud investigations lead to relevant system changes.

4.0 Culture

24.1 The Council has determined that the culture and ethics of the Authority is one of honesty and openness in all its dealings, with opposition to fraud and corruption. This strategy forms part of the governance arrangements for the authority.

24.2 The Council's ~~members~~Councillors and ~~staff~~employees play an important part in creating and maintaining this culture. They are encouraged to raise any matters that concern them relating to the Council's methods of operation in accordance with the Council's ~~Confidential Reporting~~Whistleblowing Policy.

4.3 The Council is committed to driving down Benefit Fraud. Both public perception and organisational culture play key roles in achieving this aim. All ~~Members~~Councillors and ~~Staff~~Employees are therefore required to report any known material changes affecting Benefit claims to the Benefits Office. This specifically includes your own entitlement and of any tenants or sub-tenants that you may have. Failure to do so will result in the Councillor or Employee being subject to the Benefits Prosecution Policy and Conduct and Capability Procedures. In ~~general terms~~addition, ~~this it is also a~~ requirement ~~includes that the~~ timely transfer of information you receive in your normal business activities relating to any other customer who has alerted you to a fact that affects Benefit awards is completed

42.4 The Council's ~~Confidential Reporting~~Whistleblowing Policy ensures that ~~those raising concerns know~~concerns can be raised knowing they will be treated seriously and properly investigated in a confidential and impartial manner. In raising concerns ~~staff~~employees can be assured that there will be no victimisation, and anonymity will be respected wherever possible and will not affect their employment situation or future prospects with the Council.

42.5 ~~Staff~~Employees can raise their concerns in the first instance with their line manager but where ~~staff~~employees feel unable to raise concerns with their immediate line manager/ supervisor they can deal direct with any of the following:-

- the Section 151 Officer (~~Corporate Director of~~Executive Director Corporate Services-Resources),
- Internal Audit,
- the Chief Executive,
- the Monitoring Officer,
- ~~any Corporate Director,~~
- any Assistant Directorany member of Corporate Management Team,
- ~~Internal Audit,~~
- the External Auditor, or
- any Trade Union Representative.

24.6 Elected ~~members~~Councillors, suppliers, contractors, and the general public are also encouraged to report concerns through any of the above routes.

4.7 Unless there are good reasons to the contrary, any allegations received by way of confidential letters or telephone calls will be taken seriously and investigated in an appropriate manner. All concerns will be treated 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, but this will be discussed with you,

as to whether and how the matter can be proceeded with.

4.8 The Nolan Committee set out the seven guiding principles that apply to people who serve the public. The Council will develop our working behaviour around these principles, which are attached as Appendix 1.

~~2.9 Assistant Directors are responsible for dealing with any allegations of fraud and corruption that they receive in consultation with the Corporate Director of Resources (in accordance with Financial Regulations) and they will do so in a thorough, prompt, professional and impartial manner.~~

~~2.10 The investigating officer will be appointed by the Corporate Director of Resources. The investigating officer will usually be an Internal Audit Officer, or in the case of Benefit Frauds, a Benefits Investigations Officer. The investigating officer will:-~~

- ~~• deal promptly and confidentially with the matter,~~
- ~~• record all evidence received,~~
- ~~• ensure that evidence is sound and adequately supported,~~
- ~~• ensure security of all evidence collected,~~
- ~~• liaise as necessary and appropriate with the relevant Assistant Directors,~~
- ~~• liaise as necessary with external agencies e.g. Police,~~
- ~~• notify the Council's insurers if appropriate~~

~~2.11 The Council can be expected to deal swiftly and thoroughly with any member of staff who attempts to defraud the Council or who is corrupt. The Council will deal positively with fraud and corruption or suspicions thereof. Where appropriate, the Council's disciplinary procedures will be implemented.~~

~~2.12 There is a need to ensure that any investigation process is not misused and, therefore, any abuse such as raising unfounded malicious allegations may be dealt with as a disciplinary matter.~~

~~2.13 When it is found that fraud or corruption has occurred due to a break down in the Council's systems or procedures, Assistant Directors will ensure that appropriate improvements in systems of control are implemented in order to prevent a reoccurrence.~~

35.0 Prevention

53.1 Staff Employees

53.1.1 The Council recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential

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staffemployees, in terms of their propriety and integrity. In this regard temporary agency and contract staffemployees should be treated in the same manner as permanent staffemployees. Assistant DirectorsChief Officers are responsible for ensuring agencies engaged for the supply of temporary staffemployees have rigorous vetting processes and that references are sought direct from previous clients with regard to the suitability and integrity of the candidate.

35.1.2 StaffEmployee recruitment is required, ~~therefore~~, to be in accordance with procedures laid down by the Council. Written references covering the known honesty and integrity of potential staffemployees and where required, evidence of a licence to practice must always be obtained. All qualifications will be verified. There will be an open and fair policy of recruitment with no 'canvassing' or 'favouritism'.

35.1.3 StaffEmployees of the Council are expected to follow any Code of Conduct relating to their personal Professional Body and also abide by the terms and conditions of employment as set out in the Employees HandbookContract of Employment and the National Scheme of Conditions. The Council will report any known impropriety to the relevant Institution for them to consider appropriate disciplinary action.

53.1.4 StaffEmployees are reminded that they must comply within Section 117 of the Local Government Act 1972 which requires any interests in contracts that have been or are proposed to be entered into by the Council to be declared. The legislation also prohibits the acceptance of fees or rewards other than by means of proper remuneration. Details are described within the Code of Conduct.

53.1.5 Managers are required to observe the formal DisciplinaryConduct and Capability Procedures.

53.1.6 All staffemployees are required to declare in a public register (held by the Monitoring Officer) any offers of gifts or hospitality which are in any way related to the performance of their duties in relation to the Authority. Employees should also declare private work (paid or unpaid) etc., which if permitted must be carried out during hours when not employed on Council work, and should not be conducted from Council premises or use any Council equipment/assets. ~~Staff attention is drawn to Section 7 in the Employees' Handbook, — Code of Conduct.~~

5.1.7 The above matters are brought to the attention of employees via induction training and ~~the issue of the Employees Handbook and~~ subsequently by internal communications.

5.1.8 Management at all levels are responsible for ensuring that ~~their~~ staffemployees are aware of the Authority's Financial Regulations and Standing Orders, and that the requirements of each are being met. They are also responsible for ensuring that appropriate procedures are

in place to safeguard the resources for which they are responsible, which include accounting control procedures, working manuals and operating procedures. Management must ensure that all staffemployees have access to these rules and regulations and that staffemployees receive suitable training.

5.1.9 Managers should strive to create an environment in which their staffemployees feel able to approach them with concerns they may have about suspected irregularities. If managers and staffemployees are unsure of the appropriate action they should be aware of the role of consult with the Internal Audit UnitSection.

35.2 MembersCouncillors

53.2.1 MembersCouncillors are required to operate within: -

- Sections 49 - 52 of the Local Government Act 2000,
- Local Authorities (Members' Interest) Regulations 1992 (S.I. 618)
- The National Code of Local Government Conduct
- Any local code or amendments agreed and
- The Council's Standing Orders and Financial Regulations.

53.2.2 These matters are specifically brought to the attention of elected membersCouncillors at their induction and subsequent training. MembersCouncillors are required to provide the Monitoring Officer with specific information concerning their personal and prejudicial interests and to keep that information up to date, as required by the Local Government and Housing Act 1989. The Members Interests Register is held by the Monitoring Officer.

53.3 Systems

35.3.1 The Council's Scheme of Delegation, Standing Orders and Financial Regulations place a duty on all membersCouncillors and employees to act in accordance with best practice when dealing with the affairs of the Council.

53.3.2 The Corporate Director of ResourcesExecutive Director Corporate Services has a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure proper administration of financial affairs. Various Codes of Practice outlining systems, procedures and responsibilities are widely distributed to employees.

35.3.3 The Internal Audit UnitSection assesses regularly the level of risk within the Council with a view to preventing fraud and corruption. Such

assessments are discussed with Assistant Directors/Chief Officers and, where appropriate, incorporated into work plans.

35.3.4 Significant emphasis has been placed on thorough documentation of financial systems, and every effort is made to continually review and develop these systems in line with best practice to ensure efficient and effective internal controls and to include adequate separation of duties. The adequacy and appropriateness of the Council's financial systems are independently monitored by both the Internal Audit Unit/Section and External Audit. Any weaknesses identified in internal control will be reported to management whose duty it will be to ensure that corrective action is taken. The Section 151 Officer will use his statutory power to enforce the required changes if necessary.

35.3.5 Assistant Directors/Chief Officers will ensure that internal controls, including those in a computerised environment, are effectively maintained and documented and will investigate any potential weaknesses.

5.3.6 Chief Officers must ensure that proportionate counter fraud measures are applied to new systems/procedures.

35.3.67 It is evident across the country that an increasingly wide variety of frauds are being perpetrated. The larger frauds may involve the creation of multiple identities and false addresses, and involve different agencies. Staff/Employees are therefore encouraged to liaise with those other agencies, exchanging information, where possible and appropriate to help prevent and detect such fraud. It is important that arrangements exist, and are developed, to encourage the exchange of information with other agencies including:-

- other local and statutory authorities,
- Treasurers' Associations and Societies/Chief Financial Officer Group,
- local, regional and national Auditor networks,
- government departments,
- police forces,
- the Audit Commission, **and**
- the National Anti-Fraud Network, and
- any other Fraud Networks/Forums.

35.3.87 The Council has established formal procedures to respond to complaints received about any aspect of service delivery. Issues relating to fraud and corruption will be passed directly to the Corporate Director of Resources/Executive Director Corporate Services. Specific guidance has also been issued to all staff/employees in relation to Proceeds of Crime and Money Laundering. The Monitoring Officer acts as the Council's Money Laundering Reporting Officer.

~~35.3.98~~ The Council will involve the police to prosecute offenders where fraudulent or corrupt acts are discovered. This will be a matter for the ~~Corporate Director of Resources~~Executive Director Corporate Services, Monitoring Officer and the Chief Executive to decide, in consultation with the relevant ~~Assistant Directors~~Chief Officer.

46.0 Detection ~~And~~ and Investigation

~~46.1~~ The Council's preventative systems, particularly internal control systems, provide indicators of fraudulent activity and are designed to deter any fraudulent activity.

~~46.2~~ It is often the alertness of elected ~~members~~Councillors, council ~~staff~~employees, and the general public to the possibility of fraud and corruption, that enables detection to occur and appropriate action to take place.

~~46.3~~ Many frauds are discovered by chance, 'tip-off' or general audit work and arrangements are in place to enable such information to be properly dealt with.

~~46.4~~ ~~Assistant Directors~~Chief Officers are required by Financial Regulations to report all suspected instances of fraud and corruption to the ~~Corporate Director of Resources~~Executive Director Corporate Services. Early reporting is essential to the success of this strategy, and;

- ensures the consistent treatment of information regarding fraud and corruption,
- facilitates a thorough investigation of any allegation received by an independent unit (Internal Audit), and
- ensures maximum protection of the Council's interests.

Suspicious that any transaction or dealing may involve the proceeds of crime should be reported to the Monitoring Officer, who will ensure such suspicions are reported to the ~~relevant~~appropriate authorities as required by the relevant Act.

~~6.5~~ The investigating officer will be appointed by the Executive Director Corporate Services. The investigating officer will usually be an Internal Audit Officer, or in the case of Benefit Frauds, a Benefits Investigations Officer. The investigating officer will:-

- deal promptly and confidentially with the matter,
- record all evidence received,
- ensure that evidence is sound and adequately supported,
- ensure security of all evidence collected,
- liaise as necessary and appropriate with the relevant Chief Officer,

- liaise as necessary with external agencies e.g. Police,
- notify the Council's insurers if appropriate.

6.6 The Council can be expected to deal swiftly and thoroughly with any employee who attempts to defraud the Council or who is corrupt. The Council will deal positively with fraud and corruption or suspicions thereof. Where appropriate, the Council's disciplinary procedures will be implemented.

6.7 There is a need to ensure that any investigation process is not misused and, therefore, any abuse such as raising unfounded malicious allegations may be dealt with as a disciplinary matter.

6.8 When it is found that fraud or corruption has occurred due to a break down in the Council's systems or procedures, Chief Officers will ensure that appropriate improvements in systems of control are promptly implemented in order to prevent a reoccurrence.

4.56.9 Depending on the nature and anticipated extent of the allegations, the Internal Audit ~~unit~~section will normally work closely with management and other agencies such as the police to ensure that all allegations and evidence is properly investigated and reported upon.

4.66.10 The Council's ~~D~~isciplinary P~~rocedures~~rocedures will be used where the outcome of the Audit Investigation indicates improper behaviour.

6.11 The Council will normally wish the police to independently prosecute offenders where financial impropriety is discovered.

6.12 Any ~~member~~Councillor who is the subject of allegations of wrong doing can be referred to the Standards Committee of the authority (details on the website), who will determine what action should be taken.

6.13 All contractors, consultants and organisations receiving funding from the Council who are accused of wrong doing will be the subject of an investigation and where appropriate an independent decision may be taken to terminate the agreement/grant.

4.106.14 The Council's External Auditor has a responsibility to review the Council's arrangements for the prevention, detection and investigation of fraud and corruption and report accordingly.

7.0 Recovery, Sanctions & Redress

7.1 Where the Council identifies fraud then it will:

Recover, prosecute or apply other sanctions to perpetrators, where appropriate.

- 7.2 Where fraud or corruption by employees is indicated, then action will be taken in accordance with the Council's Conduct and Capability Policy. This may be in addition to any civil recovery action or sanctions.
- 7.3 The Council aims to be effective in recovering any losses incurred to fraud using, as appropriate, criminal and/or civil law. Success rates will be monitored routinely as an indicator and part of the quality process.
- 7.4 Wherever possible, redress should be applied. This ensures that the Council is seen as recovering money lost to fraud.

58.0 Training & Awareness

- 58.1 The Council recognises the importance of training in the delivery of high quality services. The Council supports the concept of fraud awareness training for managers and for ~~staff~~employees involved in internal control systems to ensure that their responsibilities and duties in this respect are regularly highlighted and reinforced. ~~Assistant Directors Chief Officers~~ are responsible for training ~~their~~ ~~staff~~employees and promoting awareness of fraud issues.
- 58.2 Investigation of fraud and corruption centres around the Council's Internal Audit and Benefits ~~Unit~~sections. ~~Staff~~Employees engaged in these ~~Unit~~section, for the detection and prevention of fraud, are properly and regularly trained in all aspects of it. The training plans of the ~~Unit~~sections will reflect this requirement.
- 58.3 ~~Staff~~Employees who ignore such training and guidance may face the possibility of disciplinary action.
- 8.4 ~~5.4~~—Regular training seminars will be provided for ~~Members~~Councillors on a wide range of topics including declarations of interest and the ~~National~~Code of Conduct as detailed in the Constitution.
- 8.5 The Council will maintain an up to date awareness of the types of fraud that it may be exposed to, especially given the ongoing financial situation and the resourcefulness of potential fraudsters. It will review national developments and strengthen systems and procedures accordingly using the following key sources of information:
- National Fraud Reports
- National Anti-Fraud Network
- Midlands Fraud Forum

Local Networking through Staffordshire and the Midlands

Any other sources of fraud awareness/updates etc.

69.0 Sharing Information

96.1 The Council is committed to working with other agencies in the detection and prevention of fraud.

96.2 Information will be shared internally and with other government departments and other agencies eg insurance companies for the purposes of fraud prevention and detection. This information will be shared in accordance with the principles of the Data Protection Act 1998 and other appropriate legislation.

9.3 6.3—The Council participates in national data sharing exercises, i.e. the National Fraud Initiative to enable the proactive detection of fraud.

10.0 Implementing the Strategy

10.1 Internal Audit will undertake an annual assessment of the effectiveness of existing counter-fraud and corruption arrangements against:

CIPFA's Red Book 2 Fraud Standards

Other best practice/statutory guidance as required

The roles and responsibilities as set out in Appendix 2 of this strategy.

10.2 Internal Audit will complete the Counter Fraud Work Plan as detailed in Appendix 5.

10.3 Internal Audit will report its findings to the Audit and Governance Committee who will consider the effectiveness of the counter-fraud risk management arrangements.

711.0 Conclusions

117.1 The Council's systems, procedures, instructions and guidelines are designed to limit, as far as is practicable, acts of fraud and corruption. All such measures will be kept under constant review to ensure that they keep pace with developments in prevention and detection techniques regarding fraudulent or corrupt activity.

117.2 The Council will maintain a continuous review of all its systems and procedures through the Corporate Director of Resources Executive

| Director Corporate Services -and- Internal and Internal Audit, in consultation with the Monitoring Officer where required.

ANTI-COUNTER FRAUD AND CORRUPTION GUIDANCE NOTES

1.00 Introduction

1.1 — What Is Fraud And Corruption?

1.1.1 — The legislative definition of fraud is:

~~“the intention to make gain or cause loss by false representation, failing to disclose information or abuse of position”.~~

~~(The Fraud Act 2006)~~

~~The Fraud Act 2006 can be viewed at the govt. website
www.opsi.gov.uk~~

1.1.2 — Corruption is defined as:-

~~“the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.”~~

~~(Fraud Audit Manual, the Audit Commission)~~

1.2 — Why Do We Need An Antia Counter- Fraud And Corruption Strategy?

1.1 Even though the vast majority of people working for the Council are honest and diligent, the Council cannot be complacent. Fraudulent or corrupt acts may include:

System issues	ie where a process/system exists which can be abused by either employees or members of the public (eg Housing Allocations)
Financial issues	ie where individuals or companies have fraudulently obtained money from the Council (eg invalid invoices/work not done, Housing Benefit fraud)
Equipment issues	ie where Council equipment is used for personal use (eg personal use of council telephones)
Resource issues	ie where there is misuse of resources (eg theft of building materials/cash)
Other issues	ie activities undertaken by officers of the Council which may be: unlawful; falls below established standards or practices; or amounts to improper conduct (eg receiving unapproved hospitality)

~~(This is not an exhaustive list.)~~

1.2.2 The prevention of fraud, and the protection of the public purse is **EVERYONE'S BUSINESS**. It is important that all staffemployees know:

- how to recognise a fraud,
- how to prevent it, and
- what to do if they suspect that they have come upon a fraud.

1.2.3 This guidance has been drawn up to provide information to staffemployees at all levels. The strategy and guidance attempt to assist employees and others with suspicions of any malpractice. The overriding concern is that it is in the public interest for the malpractice to be corrected and, if appropriate, sanctions and redress applied.

1.4 It is important that employees should be able to use any mechanism without fear of victimisation, and fully know that their concerns will be addressed seriously, quickly and discreetly.

1.5 It is important that the whole Council works together to reduce Benefit ~~f~~Fraud. All employees are therefore required to transfer relevant information gathered in their normal day to day activities about possible Benefit irregularities to the Benefits Office, at Marmion House. So, for example, if ~~there is~~during a routine visit/interview you become aware that a customer is working and "signing on" this may be legitimate which they may be entitled to do so. ~~You are not expected to delve any further~~ but you must tell the Benefits office this information. The Benefits Staff-office will assess the matter and investigate where appropriate. You are not expected to and must not delve any further.

1.2.6 The Council has determined that it should have a culture of honesty and openness in all its dealings, with opposition to fraud and corruption. The Council's Confidential Reporting Whistleblowing Policy ("~~Whistle Blowing Procedure~~"), does this by :-

- making it clear that vigilance is part of the job. Knowingly not raising concerns may be a serious disciplinary offence,
- recognising that early action may well prevent more worry or more serious loss/damage,
- making it safe and simple to convey critical information ensuring that any concern in this area is seen as a concern and not a grievance,
- encouraging information exchange, remembering that there are two sides to every story,
- providing a way in which concerns can be raised in confidence and not necessarily via the nominated line manager or supervisor,
- recognising the need for discretion,

- ensuring the anonymity of the individual, where possible, should this be preferred by the employee, and by protecting employers from reprisals.

1.7 In line with the above, the Council encourages employees and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. The ~~Confidential Reporting Policy~~ Whistleblowing Policy is intended to encourage and enable ~~staff~~employees to raise serious concerns within the Council rather than overlooking them. ~~Full details of the procedure can be found on the intranet (Audit area)~~The Policy can be found on the Council's website (www.tamworth.gov.uk).

~~1.2.8~~ There is a need to ensure that any investigation process is not misused and, therefore, any abuse such as raising unfounded malicious allegations may be dealt with as a disciplinary matter.

~~2.01-3~~ Why Do We Need This Advice?

~~4.23.1~~ It is important that you follow the advice given and do not try to handle the problem yourself, without expert advice and assistance. A badly managed investigation may do more harm than good. There are a number of internal and external processes which have to be followed to yield a satisfactory conclusion.

~~23.0~~ How To Recognise A Fraud

~~32.1~~ Each ~~member or~~ employee must be aware of fraud and the areas within their responsibility where fraud may occur.

~~32.2~~ Fraud can happen wherever ~~staff~~employees or independent contractors complete official documentation and can take financial advantage of the Council. The risk of fraud is enhanced where ~~staff~~employees or contractors are in positions of trust or responsibility and are not checked or subjected to effective monitoring or validation. Consequently the following areas are susceptible to fraud:-

- claims for work done by independent contractors,
- travel and expense claims,
- cash receipts/ petty cash,
- payroll,
- ordering, and
- stocks and assets.

~~32.3~~ Fraud involves the falsification of records, ~~failing to disclose information or abuse of position~~. Managers need to be aware of the possibility of

fraud when presented with claims/forms/documentation etc. Issues which may give rise to suspicions are:-

- documents that have been altered, “Tippex” used thereon, or different pens and different hand writing,
- claims that cannot be checked, particularly if prior authorisation was not given,
- strange trends (use comparisons and reasonableness),
- confused, illegible text and missing details,
- delays in documentation, completion or submission, and
- no vouchers or receipts to support claims.

| **32.4** There are a number of indications of an **employee staff member** being in a situation whereby they could be acting fraudulently. Common indicators could be:-

- living beyond their means,
- under financial pressure ,
- not taking annual leave, and
- solely responsible for a “risk” area and/or possibly refusing to allow another officer to be involved in their duties and/or have minimal supervision.

| **43.0 How To Prevent It**

| **43.1** By establishing an adverse culture to fraud and corruption the Council can help to prevent its occurrence.

| **4.2** Managers need to :-

- Minimise the opportunity for fraud – this can be achieved by putting in place robust systems of internal controls and checks.
- Reduce the “Pay – Off” – this is achieved by increasing the chances of detection and increasing the penalty for the perpetrator so risks outweigh the benefits of getting “away with it”

| **4.3** There are 8 basic control types which management should concern themselves with: -

Supervision

Supervisory checks should be completed **and recorded** by the line manager on the work completed by his/her team.

Organisation

Within each system, there should be policies/procedures setting out how functions should be carried out. There should be clear structures/rules which ~~staff~~employees should work within.

Authorisation

Within a system there should be authorisation controls e.g. controls to authorise a payment (electronic/physical signature), and the correct level of authority is used in decision making.

Personnel

There should be clear roles and responsibilities and appropriate level of delegation. The right person should be doing the right job.

Segregation of Duties

Seek to avoid the sole ownership for the processing and control functions of any activity, by one employee.

Physical

This relates to physical controls e.g. access to monies, documents, security of premises etc should be appropriate and restricted where necessary. Where restricted access is necessary, access to keys/door numbers etc should be retained by the person granted access rights. They should not be left on the premises. Inventory checks ensure that assets are controlled.

Arithmetical Accuracy

Checks completed by another person to confirm the accuracy of data input/independent reconciliations of cash floats etc.

Management Functions

Within the system there should be controls for monitoring and reporting upon activity e.g the production of audit trail reports from systems etc. Monitoring to highlight irregularity/~~non~~-compliance with rules and procedures and reporting – being accountable for actions.

34.4.3 Employees need to be aware of the possibility of fraud when presented with claims/forms/ documentation, etc. They should also have an awareness of internal rules and procedures; i.e. financial regulations, standing orders, declarations of outside work, hospitality etc.

3.44.5 Deterrence and prevention is the primary aim and if managers implement and control areas as mentioned in **4.3.2**, any deviation from the set procedure should be highlighted in a timely manner.

5.0 What To Do On Suspecting A Fraud

45.1 Action By Employees

45.1.1 The Council is committed to the highest possible standards of openness, probity and accountability. Any employee who believes such standards are being breached should report their suspicions. This can be done via the Council's ~~Confidential Reporting Whistleblowing~~ Policy ~~—("Whistle blowing")~~ or you can contact the ~~Corporate Director of Resources~~ Executive Director Corporate Services, Internal Audit or ~~an Assistant Director~~ a Chief Officer.

45.1.2 You should report the matter immediately, make a note of your suspicions and provide as much factual information to support your concerns. Concerns are better raised in writing.

45.1.3 The background and the history of the concern, giving names, dates and places where possible, should be set out and the reason why the individual is particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer. The earlier the concern is expressed, the easier it is to take action. Individuals may invite their trade union or professional association to raise a matter on their behalf.

45.1.4 Do not try to carry out an investigation yourself. This may damage any investigation carried out by the Internal Audit ~~unit~~ section, the Benefits Investigations Officer or an appointed investigator. Help the official investigators by providing information as and when requested and by giving a written statement when required.

45.2 Action By Managers

54.2.1 If managers become suspicious of any action by an employee or supplier or such suspicions are reported to them they should follow these simple rules.

- if possible establish if the irregularity (potential fraud, corruption or error) is a genuine error or possible fraud.
- contact their ~~Assistant Director~~ Chief Officer or any other officer as identified in the ~~anti-Counter f~~ Fraud and e Corruption policy Strategy, who will contact the ~~Corporate Director of Resources~~ Executive Director Corporate Services or the Internal Audit ~~unit~~ section.

- contact the ~~Assistant Chief Executive~~Director transformations & Corporate Performance, where there may be implications under the disciplinary procedures for officers.
- do nothing else, except remain vigilant and await further instructions from the investigating team.

~~45.2.2~~ The Council is required to report any cases in which it is suspected that transactions involve the proceeds of crime. If ~~staff~~employees or managers have any such suspicion, this should be reported immediately to the Monitoring Officer, who shall advise on the necessary action and ensure the matter is reported to the appropriate authorities.

~~5.2.3~~ Details of the relevant contacts can be found in Appendix 4.

~~56.0~~ What Happens To The Allegation

~~56.1~~ ~~In accordance with the Confidential Reporting Policy, t~~The ~~Corporate Director of Resources~~Executive Director Corporate Services or his investigating officer, will normally carry out a full enquiry even where there is clear evidence of an offence following the Fraud Response Plan (Appendix 3). A full report will be copied and sent to:-

- the relevant ~~Assistant Director~~Chief Officer, and
- ~~the Assistant Chief Executive~~, and
- the Chief Executive to consider if there needs to be any police involvement.

~~6.2~~ ~~5.2~~—It is essential that the ~~Corporate Director~~Executive Director of ResourcesCorporate Services investigation should be a complete one and the investigating officer to whom it is delegated is entitled to expect the fullest co-operation from all ~~members of staff~~employees.

~~6.26.3~~ A full detailed report on any system control failures and recommended actions to address the failures will be issued to the relevant manager in the format of an internal audit report.

The Seven Principles of Public Life (Nolan Committee)

Selflessness

Holders of public office take decisions 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 and 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.

Statement of Expected Responsibilities

<u>Stakeholder</u>	<u>Expected Responsibilities</u>
<u>Chief Executive</u>	<u>Ultimately accountable as Head of Paid Service for the effectiveness of the Council's arrangements for countering fraud and corruption as well as corporate governance.</u>
<u>Executive Director Corporate Services (Section 151 Officer)</u>	<u>The Executive Director Corporate Services has a statutory duty, under Section 151 of the Local Government Act 1972, Sections 114 and 116 of the Local Government Finance Act 1988 and Accounts and Audit Regulations 2011 to ensure the proper administration of the Council's financial affairs. This includes Internal Audit and Benefit Fraud.</u>
<u>Solicitor to the Council (Monitoring Officer)</u>	<u>To advise Councillors and officers on ethical issues, standards and powers to ensure that the Council operates within the Law and Statutory Codes of Practice. The operation of the Council's Money Laundering Policy And Regulation of Investigatory Powers Act (RIPA) 2000 Policies and Procedures.</u>
<u>Director Transformation & Corporate Performance</u>	<u>To put in place a corporate recruitment and selection policy and monitor compliance against it.</u>
<u>Corporate Management Team</u>	<u>To ensure that fraud and corruption risks are considered as part of the Council's corporate risk management arrangements. To ensure that actions to mitigate risks in this area are effective. To notify the Executive Director Corporate Services of any fraud arising in a timely manner.</u> <u>Challenge new policies and strategies to ensure that fraud and corruption risks have been taken into account. Review the corporate framework designed to promote an over-riding counter-fraud culture on a regular basis. This will include monitoring and evaluating arrangements to ensure effectiveness and compliance with best practice.</u>
<u>Audit and</u>	<u>To monitor the Council's policies and consider the</u>

<u>Governance Committee</u>	<u>effectiveness of the arrangements for Counter Fraud and Whistleblowing.</u> <u>The Committee monitors and advises upon the Code of Conduct for members.</u>
<u>Portfolio holder – Corporate Services and Assets</u>	<u>To champion the Council’s Counter Fraud & Corruption arrangements and promote them at every opportunity.</u>
<u>Elected Councillors</u>	<u>To support and promote the development of a strong counter fraud culture.</u>
<u>Audit Commission</u>	<u>Statutory duty to ensure that the Council has in place adequate arrangements for the prevention and detection of fraud, corruption and theft.</u>
<u>Internal Audit</u>	<u>Responsible for developing and implementing the Counter Fraud and Corruption Policy Statement, Strategy and Guidance Notes and investigating any issues reported under this policy. Reporting on the effectiveness of controls to the Audit and Governance Committee. To ensure that all suspected or reported irregularities are dealt with promptly and in accordance with this Strategy and that action is identified to improve controls and reduce the risk of recurrence.</u>
<u>Senior Managers</u>	<u>To promote employee awareness and ensure that all suspected or reported irregularities are immediately referred to Executive Director Corporate Services. To ensure that there are mechanisms in place within their service areas to assess the risk of fraud, corruption and theft and to reduce these risks by implementing robust internal controls.</u>
<u>Employees</u>	<u>To comply with Council policies and procedures, to be aware of the possibility of fraud, corruption and theft, and to report any genuine concerns to the appropriate management, the Chief Executive, the Executive Director Corporate Services or Internal Audit.</u>
<u>Public, Partners, Suppliers,</u>	<u>To be aware of the possibility of fraud and corruption against the Council and report any genuine concerns</u>

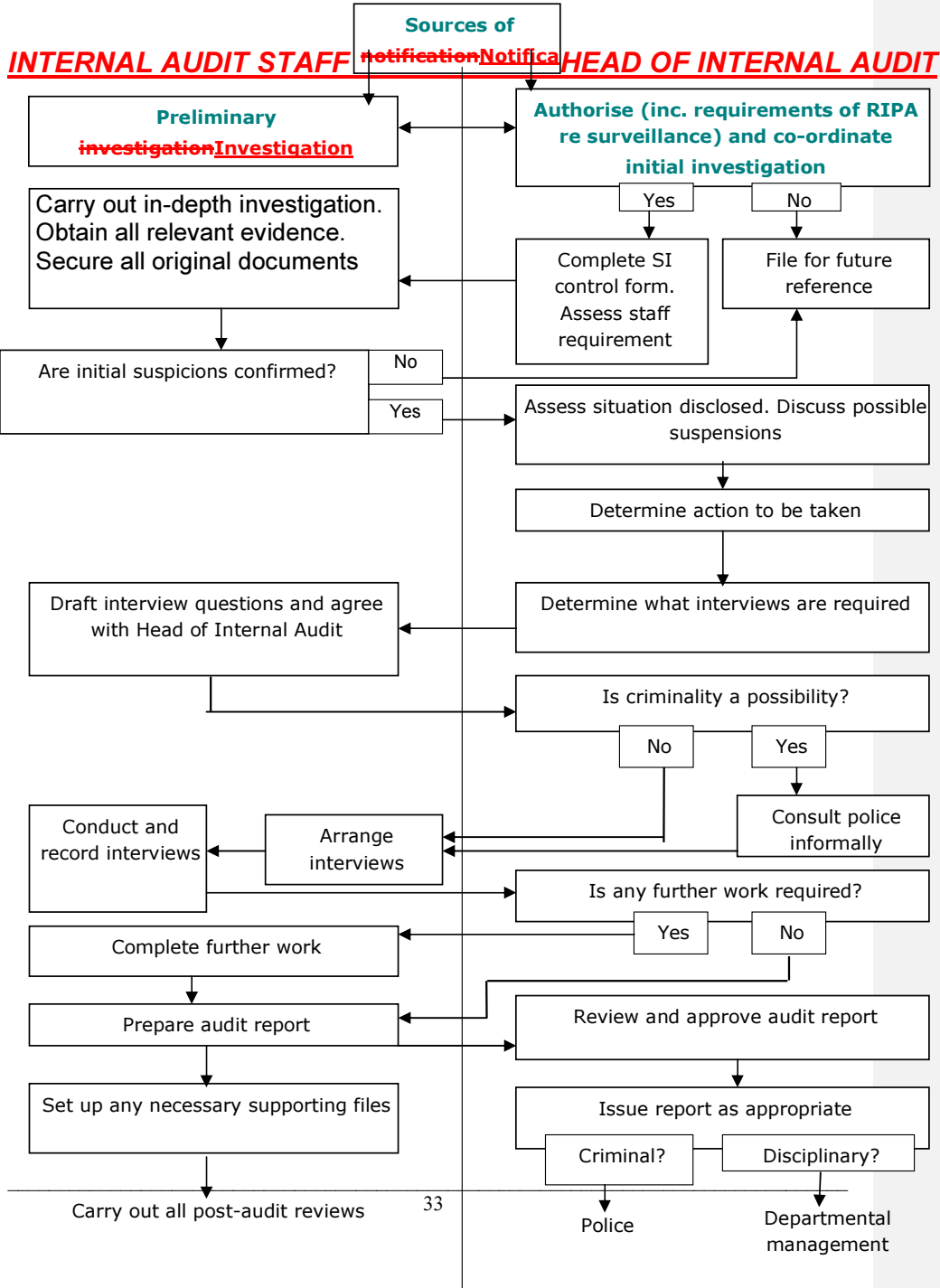
Contractors and
Consultants

or suspicions. To ensure that effective controls are in
place to mitigate risks to the Council.

Tamworth Borough Council

Fraud Response Plan

OPERATIONAL CONTROL



**HOW TO REPORT ANY SUSPECTED FRAUDS, CORRUPTION, OTHER
IRREGULARITIES OR CONCERNS**

To contact Internal Audit Services

Contact: Angela Struthers, Head of Internal Audit Services

Tel: 01827 709234 email: angela-struthers@tamworth.gov.uk

Write to Head of Internal Audit Services (Confidential)

Tamworth Borough Council

Marmion House,

Lichfield Street

Tamworth

B79 7BZ

Alternatively you can contact:

John Wheatley, Executive Director Corporate Services

Tel: 01827 709252 email: john-wheatley@tamworth.gov.uk

Jane Hackett, Solicitor to the Council and Monitoring Officer

Tel: 01827 709258 email: jane-hackett@tamworth.gov.uk

Tony Goodwin, Chief Executive

Tel: 01827 709220 email: tony-goodwin@tamworth.gov.uk

To contact the Council's external auditor

Write to:

The Audit Commission

2nd Floor, No 1 Friarsgate

1011 Stratford Road

Solihull

West Midlands

B90 4BN

Tel: 0844 798 7173

Whistleblowing hotline: 0845 052 2646

To report Housing and Council Tax Benefit Fraud contact:

Tamworth Borough Council Benefits Fraud Team : 01827 709525/541

National Benefit Fraud Hotline 08003286340 or

text phone number 08003286341 or

Write to PO Box No. 647, Preston, PR1 1WA

TAMWORTH BOROUGH COUNCIL INTERNAL AUDIT COUNTER FRAUD WORK PLAN 2012/13

CREATING AN ANTI-FRAUD CULTURE

<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<p><u>To build an anti-fraud culture through the adoption of various measures to promote counter fraud awareness by:</u></p> <ul style="list-style-type: none"> <u>a) Roll out of the e learning package on governance (includes counter fraud & whistleblowing)</u> <u>b) Provide drop in sessions (if required) to staff and members</u> <u>c) Continue to make available counter fraud strategies/policies on the intranet/website</u> 	<p><u>1. Failure to make staff, member and the public that their suspicions will be treated confidentially, objectively and professionally.</u></p>	
<u>RESOURCE (DAYS)</u>		<u>5</u>

<u>DETECTING FRAUD</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Review communications so that the most effective ways of communicating with staff are utilised.</u>	<u>A lack of robust strategic approach to deterring fraud can undermine actions to build an anti-fraud culture</u>	
		<u>Resources (Days)</u>

<u>PREVENTING FRAUD</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Review the existing counter fraud policy statement, strategy and guidance notes and update and amend as appropriate.</u>	<u>Out of date policies and procedures which do not cover relevant legislation</u>	
<u>Review financial guidance and update and amend as appropriate.</u>	<u>Out of date policies and procedures which do not cover relevant legislation</u>	
<u>Review and update the fraud risk register in line with potential system weaknesses identified during audits or investigations.</u>	<u>Potential risks not identified</u>	
<u>Resources (Days)</u>		<u>12</u>

<u>DETECTING FRAUD</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Undertake enquiries as a result of the outcome of the Audit Commission's National Fraud Initiative</u>	<u>If not undertaken, there is a risk that the opportunity to abuse a system weakness may be heightened as the risk of being caught maybe deemed negligible by the perpetrator.</u>	
<u>Undertake local proactive exercises at the Authority as agreed with the Executive Director Corporate Services</u>	<u>If not undertaken, there is a risk that the opportunity to abuse a system weakness may be heightened as the risk of being caught maybe deemed negligible by the perpetrator.</u>	
<u>Resources (Days)</u>		<u>12</u>

<u>INVESTIGATIONS</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>All referrals will be investigated in accordance with the Counter Fraud and Corruption Policy Statement and Strategy.</u>	<u>The risk of not investigating is that fraud goes unpunished and there is no resulting deterrent effect thus increasing the prevalence of fraud further.</u> <u>The staff (or others) making the allegation feel they are not taken seriously and referrals cease to be made.</u>	
<u>Resources (Days)</u>		<u>20</u>

<u>SANCTIONS</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Ensure that the sanctions are applied correctly and consistently.</u>	<u>If sanctions are not imposed there is no deterrence of fraud.</u>	
		<u>Resources (Days)</u>

REDRESS

<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Maintain comprehensive records of time spent on each investigation so that this can be included in any compensation claim.</u> <u>Identify and maintain a record of the actual proven amount of loss so that appropriate recovery procedures can be actioned.</u>	<u>Fraudsters may not realise that any and all measures will be taken to recover any money lost to fraud.</u>	
		<u>Resources (Days)</u>

<u>MANDATORY COUNTER FRAUD ARRANGEMENTS (STRATEGIC WORK)</u>		
<u>OBJECTIVE</u>	<u>RISK</u>	<u>PROGRESS</u>
<u>Attendance at relevant fraud forums/meetings to ensure that professional knowledge and skills are maintained.</u> <u>Completion and agreement of work plan.</u> <u>Regular meetings with the Executive Director Corporate Services.</u> <u>Quarterly report of counter fraud work.</u> <u>Attendance at relevant training as required.</u>	<u>Failure to ensure the completion of mandatory strategic work may mean that the professional knowledge and skills are not maintained to a high standard.</u>	
<u>Resources (Days)</u>		<u>5</u>
<u>TOTAL RESOURCES (Days)</u>		<u>54</u>