

	<h2 style="color: green; text-align: center;">Anti-Fraud and Corruption Policy</h2>
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**Approved by:** Borough Solicitor and Assistant Director (Finance)  
**Next review date:** January 2015 and as required  
**Lead officer:** Borough Solicitor

### INTRODUCTION

- The Council expects the highest standards of conduct and integrity from all who have dealings with it including staff, members, contractors and the public. It is committed to the elimination of fraud and corruption and to ensuring that all activities are conducted ethically, honestly and to the highest possible standard of openness and accountability so as to protect public safety and public money.
- Each year fraud and corruption within the public sector results in the loss of millions of pounds of taxpayer money, the majority being in respect of outside individuals and groups. Examples of fraud include falsification of housing benefit claims and renovation grant claims. An example of corruption is payment or provision of a gift to a Council official to influence a decision or approve a contract.
- In recognition of this fact Stevenage Borough Council, in addition to stating its opposition to fraud and corruption, is constantly reviewing its working procedures to increase internal control and prevent fraudulent or corrupt practices. The purpose of this policy is to reinforce the Council's commitment and provide guidance to anyone having dealings with the Council.
- In order to combat fraud and corruption the Council recognises the need for the support of its members and staff. The Council expects that members and staff will lead by example and adhere to the highest standards of honesty and integrity. They will act in accordance with necessary legal requirements, rules, procedures and practices. The Council also expects individuals and organisations that deal with the Council to meet these requirements.

### POLICY STATEMENT

- Stevenage Borough Council is committed to the fight against fraud, corruption and theft, whether by employees, contractors or members of the public. It will be dealt with seriously and severely, wherever it is found. The

Council promotes a culture of honesty, openness and accountability and will take every action necessary to protect the public funds within its control from misappropriation.

Individuals are encouraged to support the Council in this aim through reporting any suspicion or concern they might have over a suspected irregularity. Where this is done the Council undertakes to protect individuals raising a concern from reprisal.

Individuals may choose to report any concerns they have to their line manager.

Alternatively the Council has a whistleblowing Policy on its INTRANET and disclosures can also be made in confidence directly to the Assistant Director Finance, in person, by telephone on 01438 242933 or the fraud hotline on 0800 0520263, by email [whistleblowing@stevenage.gov.uk](mailto:whistleblowing@stevenage.gov.uk) or by writing to Assistant Director (Finance), Daneshill House, Danestrete, Stevenage, Herts SG1 1HN.

## **SCOPE OF THIS POLICY**

- This policy is designed to stand alongside and support existing policies within the Council. It is not intended to replace those policies and where fraud or corruption is identified that relates to other policies and procedures then reference should be made to them.
- There are a number of policies and procedures, which outline best practice in matters of a financial and contractual nature. The Council's Constitution provides a framework on how Council business is to be properly conducted and contain vital information of interest for members and staff. The Financial Regulations for internal control matters relating to public assets, income and expenditure.
- Financial Regulation 12.2 states that: "The Strategic Director (Resources) and the Assistant Director (Finance) shall be notified immediately by the Strategic Director of the Service Delivery Unit concerned of any suspected irregularity concerning cash, stores or other property of the Council or any suspected irregularity in the exercise of the functions of the Council. The Strategic Director (Resources) shall take such steps as he or she considers necessary by way of investigation and report.
- The Code of Conduct for Employees outlines expected standards of behavior. In matters of employment there are clear Recruitment and Selection criteria which aim to ensure that the processes carried out by the Council are fair.
- Members on accepting office are required to declare that they will be guided by the Council's Code of Conduct for Members. The code sets out the requirements for registering and disclosing interests and gives guidance on the acceptance of gifts or hospitality and how these should be

reported. Members also have to comply with the Council's Standing Orders and Financial Regulations.

## **PREVENTATIVE MEASURES**

- The above procedures are seen as a positive measure in the prevention of fraud or corruption. These and other guidance notes are issued to Members and staff. The Council considers these procedures extremely seriously and where staff or Members fail to adhere to them, they may be dealt with through disciplinary procedures. Members will be dealt with in a manner appropriate to the particular circumstances of the case which may be through a referral to the Standards Committee, though in certain serious circumstances could result in a referral to the Department of Public Prosecutions (DPP). Staff will normally be dealt with through the Disciplinary policy depending on the particular circumstances of the case. Action against members and officers may include prosecution and civil procedure if appropriate.
- The Council has developed systems which incorporate efficient and effective internal controls. These ensure adequate separation of duties so that error or misappropriation is prevented. Financial Regulation 1 .3 states that: 'All Members and staff have a general responsibility for taking reasonable action to provide for the security of the assets under their control, and for ensuring that the use of these resources is legal, is properly authorised, provides value for money and achieves best value'.
- With changing staff and new legislation there is a constant need to keep systems under review. Therefore the existence, appropriateness and effectiveness of these internal controls is independently monitored and reviewed by the Shared Internal Audit Service (SIAS) and the Council's External Auditor
- The Council works with other Councils and Agencies as appropriate to assist with the detection and prevention of fraud and corruption. Arrangements continue to develop to facilitate the exchange of information as appropriate. Information is exchanged in accordance with the Data Protection Act 1998, any appropriate partnership/ shared service agreements, data sharing protocols in place and relevant legal requirements.