

## CENTRAL BEDFORDSHIRE COUNCIL

At a meeting of the **CONSTITUTION ADVISORY GROUP** held in Room 15, Priory House, Monks Walk, Shefford on Monday, 9 November 2009

### PRESENT

Cllr S F Male (Chairman)

|       |                     |       |              |
|-------|---------------------|-------|--------------|
| Cllrs | Mrs C F Chapman MBE | Cllrs | D J Lawrence |
|       | D Jones             |       | A Shadbolt   |
|       | M R Jones           |       |              |

#### CAG/09/20 **Notes of Previous Meeting**

The Advisory Group considered the notes of the meeting held on 25 August 2009.

#### **AGREED:**

**That the notes of the meeting held on 25 August 2009 be confirmed as a correct record.**

#### CAG/09/21 **Review of Capital Programme Processes**

The Advisory Group considered a report from the Director of Resources proposing a variation of the procedures relating to the Capital Programme. The Advisory Group noted that the report had arisen following a meeting between the Leader of the Council, Portfolio holders for Corporate Resources and for Culture and Skills, the Deputy Chief Executive/Director of Children, Families and Learning and the Director of Corporate Resources to discuss problems that had arisen regarding the operation of the provisions within the Constitution relating to the Capital Programme.

Members were advised that since the establishment of the authority, a number of operational issues have emerged regarding the processes for incurring Capital Programme expenditure as set out in the Council's Constitution (primarily through the Code of Financial Governance) and the Capital Handbook. These included

- the nature of both the Constitution and Handbook processes which are more relevant for specific, higher-value, projects (rather than rolling programmes and low value schemes)
- the potentially restrictive nature of the Constitution re: approvals, variances, and virements;
- confusion and uncertainty regarding the application of processes to legacy authority schemes and the status of the CBC Capital Programme.

To address these issues Members were presented with suggested amendments to the Code of Financial Governance (Part I2 – Section 4.9) proposing the grouping of Capital Schemes into four main categories (Rolling Programmes, Major Capital Schemes over £500k whole life cost, Intermediate Capital Schemes between £60k - £500k whole life cost and Minor Capital Schemes under £59.999k whole life cost) together with a suggested approval process for each category and the level of project documentation to be produced through Outline and Detailed Business Case requirements. The current requirement in the Code of Financial Governance for Executive approval of a Project Initiation Document in all cases before a capital project could proceed would be removed.

These proposed amendments would impact upon other Constitution and Capital Handbook issues as follows:

- approval of new projects during the course of the year
- approval of variations in scheme costs
- virements.

Members proposed lifting restrictions on capital programme variations and took the view that this action would obviate the need for virements.

It was noted that the new procedures would apply equally to capital projects that were wholly externally funded, where the Council was responsible for exercising proper governance arrangements.

Members also proposed amendments throughout the Code of Financial Governance to reflect that authority for approvals should be given by the relevant Portfolio Holder in consultation with the relevant Director rather than vice versa. In the interests of greater transparency and to facilitate further Executive delegation, this should be adopted as a general principle in future, although it was not proposed at this stage to amend existing delegations to Directors elsewhere in the Constitution.

Members also noted that all references to the 'Assistant Director Audit, Risk and Health and Safety Management' would be amended to read 'Assistant Director Audit and Risk'.

#### **AGREED TO RECOMMEND:**

- 1. That Section 4.9 of the Code of Financial Governance (Part I2) be replaced by a new Section 4.9 as set out in Appendix A to these Notes.**
- 2. That in Part C2, paragraph 1.3.3, the words 'project initiation document' be replaced by 'detailed business case'.**
- 3. That, as a general principle, future delegations requiring sanction by a Portfolio Holder should be phrased as being to the relevant Portfolio Holder in consultation with the relevant Director, rather than vice versa.**

CAG/09/22 **Key Decisions**

The Advisory Group discussed the Definition of a Key Decision as set out in Part C2, paragraph 1 of the Constitution in the light of some uncertainty of interpretation as to the meaning of the financial threshold as between annual and whole life costs.

Members also sought to clarify uncertainty in relation to other delegated functions such as land acquisitions and disposals (Part H3, paragraph 4.6.71) and procurement (Part I3, paragraph 5.1) where a limit of £200,000 is set on officers' powers.

The Advisory Group discussed whether the criterion in Part C2, paragraph 1.1.2 relating to a decision having a significant effect on communities living or working in an area comprising one or more wards in the Council's area should be amended. After discussion it was agreed that this could be revisited at a later date.

**AGREED TO RECOMMEND:**

- 1. That Paragraph 1.2 of Part C2 (Key Decisions and the Forward Plan) be amended to read:**

**“For the purposes of 1.1.1 above, savings or expenditure are significant if they exceed £200,000 per annum (revenue) or £200,000 whole life cost (capital), or 10% of the budget for the cost centre concerned, whichever is the smaller.”**

Arising from the above discussion and concerns expressed elsewhere about the need to reduce the extensive workload of the full Executive, the Group also considered the possible introduction of delegated arrangements to Portfolio Holders generally to authorise savings or expenditure (including procurement) between £200,000 and £500,000, which currently required approval by the full Executive. This would bring the delegation arrangements for revenue and capital into line with the revised Capital Programme processes the Group was now recommending.

Members were aware that such a change would require a specific delegation by the Leader.

**AGREED TO RECOMMEND:**

- 2. That the Leader be requested to agree a general scheme of delegation to Portfolio Holders to authorise savings or expenditure between £200,000 and £500,000 inclusive (revenue per annum or capital whole life/total contract value), in order to assist in reducing the workload of the full Executive while avoiding the need to make individual delegations to the relevant Portfolio Holders.**

3. **That authority for approving savings or expenditure over £500,000 (revenue per annum or capital whole life/total contract value) continue to rest with the full Executive.**
4. **That the thresholds in 1. and 2. above be applied to the Code of Procurement Governance (Part I3, paragraph 5.1) and Land Acquisitions and Disposals (Part H3 – paragraph 4.6.71).**

CAG/09/23 **Fees and Charges**

The Advisory Group discussed whether to include the individual fees and charges in the Fees and Charges Policy in the Budget and Policy Framework (Part B2, paragraph 1.1.3.2).

**AGREED:**

**That no change be made to the current provision in Part B2.**

CAG/09/24 **Analysis of Executive Agendas**

Arising from growing concerns among Executive Members about the number and length of items submitted to the full Executive, the Advisory Group considered a report from the Assistant Director Legal and Democratic reviewing the impact of constitutional requirements on the volume of work presented to the Executive for decision and hence the efficiency of the decision-making process. The report analysed the reasons for submitting over 30 reports to the two most recent Executive meetings and the constitutional provisions behind them.

Whilst Members concluded that all items had rightly been submitted, they were mindful that the recommendations proposed in CAG/09/22 above would help in reducing the number of reports to be referred to the Executive. Members also discussed other initiatives aimed at reducing paperwork to be presented to the Executive including more concise, streamlined reports without unnecessary history included, making a copy of appendices available in the Members' Room rather than being included with the agenda papers and circulating website links to the papers electronically to all Executive Members. Members were reminded that Executive had recently introduced guidelines that the narrative section of its reports should not normally exceed two pages with supporting evidence and detail contained in appendices.

The Advisory Group felt it was appropriate for the new measures to be given time to bed in before assessing their impact on the Executive workload.

**AGREED:**

**That a further review of Executive agendas be undertaken in six months.**

CAG/09/25 **Anti-Fraud and Corruption Strategy and Confidential Reporting Policy**

The Advisory Group considered the Anti-Fraud and Corruption Strategy and Confidential Reporting ('Whistleblowing') Policy which had been approved by both the Audit and Standards Committees and referred to the Group for inclusion in the Constitution.

**AGREED TO RECOMMEND:**

- 1. That the Anti-Fraud and Corruption Strategy be included in the Constitution under Part I1 – Finance, Contracts and Legal Matters.**
- 2. That the Confidential Reporting ('Whistleblowing') Policy be included in the Ethical Framework appended to the Constitution.**

CAG/09/26 **Variation of Scheme of Delegation - Member Development**

The Advisory Group was advised of a new delegation and amendments to officer delegations at Part H3, paragraphs 4.6.60 and 4.6.61, which had been referred by the Member Development Champions Group and approved by the Leader in respect of Member development. Members noted the history of the Group, its role in acting as Champions for member development and its remit in working towards the standards required to achieve East of England Member Development Charter status.

The Advisory Group noted that in order to achieve flexibility and to streamline the decision making process, the necessary powers to take forward elected Member development initiatives had been given to the Assistant Director of Legal and Democratic Services who would act after consultation with the "Champions" and, where appropriate, seek the views of the political leadership and wider Council membership.

The Leader of the Council had authority under Paragraph 3 of the Executive Procedure Rules to delegate Executive functions or amend existing delegations. In compliance with the wishes of the Member Development Champions Group the Leader had therefore approved the variations to the Scheme of Delegation to Officers.

**AGREED:**

**That the revisions to the Scheme of Delegation to Officers and of the consequent winding up of the Member Development Champions Group be noted.**

CAG/09/27 **NHS Campus Closure Programme**

The Advisory Group was advised of the resolution of the Executive on 15 September 2009 to grant an additional delegation to the Portfolio Holder for Social Care and Health, in consultation with the Portfolio Holder for Corporate Resources and the Director of Social Care, Health and Housing and the Director of Corporate Resources, to approve individual projects using the NHS Campus Closure capital grant allocation to accommodate people with severe learning disabilities, subject to

- consideration of the detailed business case for each project, and
- compliance with Rule 19 of the Access to Information Procedure Rules (i.e. decisions by individual Executive Members) in respect of any key decision.

Members noted that the Leader was being asked to sign her approval to the delegation, which would then be reported to Council.

**AGREED:**

**That the additional delegation be noted.**

CAG/09/28 **Licensing Committee- Premises Licences**

The Advisory Group was advised of the resolution of the Licensing Committee on 14 October 2009 to delegate responsibility for all minor variations to premises licences and club premises certificates to the Director of Sustainable Communities. This proposal was in response to new regulations that came into force on 29 July 2009. In noting the delegation, the Advisory Group was anxious to ensure that Members were made aware of any minor variations to premises licences/certificates in their Ward.

**AGREED:**

1. **That the additional delegation to the Director of Sustainable Communities be noted.**
2. **That it be recommended to the Licensing Committee that minor variations to premises licences/certificates be notified to the appropriate Ward Member(s).**

CAG/09/29 **Petitions**

Subsequent to a request following the Executive Chairman's briefing on 3 November and given the short notice, the Advisory Group held only a preliminary discussion on possible alternatives to reporting petitions to full Executive meetings.

Members received a copy of the existing petitions procedure and were also reminded of arrangements recently put in place for petitions relating to Traffic Regulation Orders and other highways-related matters to continue to be submitted to the Executive for public receipt for onward referral to public meetings of the Portfolio Holder for Safer and Stronger Communities. It was suggested that the Executive's workload could be reduced if such petitions were in future referred direct to the public meetings of the Portfolio Holder.

**AGREED:**

- 1. That the item be considered in greater detail at the next meeting of the Group, with reference to practices in other local authorities.**
- 2. That in the meantime, all petitions received be referred direct to the body most appropriate to consider them and that the Assistant Director Legal and Democratic be given delegated authority to determine that body, subject to a Member who is presenting a petition having the right to require that petition is included on the agenda of a particular body.**

CAG/09/30 **Future Meetings**

**AGREED:**

**That the Advisory Group would meet bi-monthly and that officers would schedule meetings in the calendar to link suitably with meetings of the full Council.**

CAG/09/31 **Work Programme**

The Advisory Group identified items in connection with the development of a work programme.

**AGREED:**

**That the following items be included in a Work Programme for the Advisory Group:**

- Overview and Scrutiny arrangements, with particular emphasis on the role of the Overview and Scrutiny Co-ordination Panel and the absence in the constitution of a single overarching Overview and Scrutiny Committee;**
- Public participation arrangements for elected Town/Parish Council representatives at Development Management Committee meetings;**
- The future of Town Centre Management Committees, where the Executive was being recommended to refer any constitutional change to the Advisory Group**

- **Review of Procurement Rules particularly in relation to low- end transaction limits.**

(Note: The meeting commenced at 2.00 p.m. and concluded at 3.50 p.m.)



## APPENDIX A

## 12 CODE OF FINANCIAL GOVERNANCE

## 4.9 Capital Programme:

- 4.9.1 Investment in capital assets shapes future service delivery and creates future financial commitments. The Capital Programme is a three-year programme of estimated capital expenditure and associated funding. The Full Council will approve a Capital Programme each year, recognising that approving initial estimates is the first stage in the process of progressing a proposed scheme to implementation. Estimates produced at this stage will be liable to change.
- 4.9.2 The Executive will receive budgetary proposals for inclusion in the Council's Capital Programme and will submit a proposed programme to Full Council for approval. The programme will include all capital schemes including those proposed to be financed from revenue resources or external funding sources.
- 4.9.3 Capital Schemes will be grouped into four main categories:
- Rolling Programmes;
  - Major Capital Schemes (over £500,000 Whole Life Cost);
  - Intermediate Capital Schemes (between £60,000 - £500,000 Whole Life Cost)
  - Minor Capital Schemes (under £59,999 Whole Life Cost);
- 4.9.4 Outline Business Case  
All categories of capital projects will require an Outline Business Case in order to be considered for inclusion in the proposed Capital Programme. An Outline Business Case will normally have best estimates of capital and revenue costs, timescales, and deliverables. Outline Business Cases will be approved by the relevant Portfolio Holder in consultation with the relevant Director, the Portfolio Holder (Corporate Resources) and the Chief Finance Officer.
- 4.9.5 Detailed Business Case  
A Detailed Business Case will have fully validated costs (including ongoing revenue costs), timescales, deliverables and where necessary an exit strategy.  
The process for approving capital schemes for subsequent implementation will be different according to their category and is explained in paragraphs 4.9.6 to 4.9.9 below.

#### 4.9.6 Rolling Programmes

Rolling programmes in the Council's Capital Programme are largely concentrated on infrastructure and asset improvement and maintenance.

After a Rolling Programme has been approved by the Council for inclusion in the Capital Programme, a single Detailed Business Case will be produced for the whole programme before it proceeds.

The Detailed Business Case and release of capital expenditure will be approved by the relevant Portfolio Holder in consultation with the relevant Director, the Portfolio Holder (Corporate Resources) and the Chief Finance Officer.

#### 4.9.7 Major Capital Schemes (over £500,000 Whole Life Cost)

After a Major Capital Scheme has been approved by the Council for inclusion in the Capital Programme, a Detailed Business Case will be produced for the scheme. Executive Approval will be required for these schemes before proceeding to implementation.

For Major Capital Schemes, some further costs may need to be incurred to take a project up to Detailed Business Case stage. Directors can authorise expenditure up to a level of 5% of the total scheme cost at this stage to enable a Detailed Business Case to be produced. The revenue budget of the applicable directorate will meet these costs if ultimately the scheme does not proceed for any reason.

#### 4.9.8 Intermediate Capital Schemes (between £60,000 and £500,000 Whole Life Cost)

Intermediate Capital Schemes in this range will require a Detailed Business Case to be produced before it proceeds.

The Detailed Business Case and release of capital expenditure will be approved by the relevant Portfolio Holder in consultation with the relevant Director, the Portfolio Holder (Corporate Resources) and the Chief Finance Officer.

#### 4.9.9 Minor Capital Schemes (under £59,999 Whole Life Cost)

A Detailed Business Case is not required for these schemes and Minor Capital Schemes in this range can proceed with the approval of the relevant Portfolio Holder in consultation with the relevant Director, the Portfolio Holder (Corporate Resources) and the Chief Finance Officer.

4.9.10 In year, the Executive may approve new Capital Schemes estimated to cost less than £500,000 (whole life cost) that have not previously been included in the Capital Programme, subject to the production of Outline and Detailed Business Cases as required by paragraphs 4.9.6 and 4.9.8 to 4.9.9. New Major Capital Schemes estimated to cost more than £500,000 (whole life cost) must be approved by Full Council.

#### 4.9.11 Capital Programme Variations

Where there are variations in contract costs on existing schemes compared with the provision in the Capital Programme, additional costs will be approved in accordance with the following conditions:-

| <b>Existing Scheme Additional Costs</b>                                  | <b>Approval Powers</b>                          |
|--|---|
| Up to £25k or 10% (whichever is the greater)                             | Relevant Portfolio Holder and relevant Director |
| Up to £100k or between 10-25% (whichever is the greater)                 | Executive                                       |
| Over £100k or over 25% of the original budget (whichever is the greater) | Council   |

Where additional costs are agreed, the relevant Portfolio Holder in consultation with the relevant Director will seek compensatory savings.

4.9.12 The Chief Finance Officer will report to the Executive on the monitoring of the approved Capital Programme, including: expenditure and income to date; projected expenditure and income and approved variations.

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**Appendix B****Contents**

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**Anti-fraud Strategy Part 1****Anti-fraud and Corruption Policy**

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- Members
- Staff
- Contractors and Partners
- The Public and External Organisations

**Anti-fraud Strategy Part 2 – Prosecution Policy**

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- Public interest Factors

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Officer Fraud and Corruption

**Anti-fraud Strategy Part 3 – Fraud Response Plan****Anti-fraud Strategy Part 4 – Further Information****Appendix A - Nolan Committee Report – The Seven Principles of Public Life****Appendix B – Specific Responsibilities**

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## Central Bedfordshire Anti-fraud Strategy Part 1

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### Anti-fraud and Corruption Policy

#### Introduction

This document sets out Central Bedfordshire's policy and strategy in relation to fraud and corruption. It has the full support of the Council's Members and Central Bedfordshire Management Team (CBMT)

Central Bedfordshire is committed to the eradication of fraud, corruption and misappropriation and to the promotion of high standards of integrity. Our desire is to be a model of public probity, affording maximum protection to the funds we administer.

To deliver Central Bedfordshire's corporate strategy, we need to maximise the financial resources available to us. In order to do this we must reduce fraud and misappropriation to an absolute minimum.

Furthermore, Central Bedfordshire recognises its fiduciary responsibility to protect public funds and we will endeavour to implement secure systems and high standards

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of conduct. We will seek the strongest possible sanctions against those who seek to defraud the Council. This includes our own members, officers, contracting partners and external individuals and organisations.

Our strategy to deal with fraud, corruption and misappropriation is built upon seven key concepts: Culture, Deterrence, Prevention, Detection, Investigation, Sanctions and Redress.

For the purposes of this policy, fraud is defined as the intentional distortion of records for gain; corruption as the offering or acceptance of inducements designed to influence official action; financial malpractice as theft of funds or assets from the Council or its clients and intentional, unauthorised breaches of financial regulations; and misuse of official position as employees or their friends, relatives or acquaintances benefiting inappropriately from exercise of duty.

This policy excludes housing benefit fraud, which is carried out within the Benefits Service, and will be covered within a separate policy document.

#### Culture

Our strategy to reduce fraud is based on deterrence, prevention, detection,

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investigation, sanctions and redress within an over-riding anti-fraud culture. We will promote this culture across all our service areas and within the community as a whole. One pound lost to fraud means one pound less for public services. Fraud is not acceptable and will not be tolerated.

We will seek to promote an anti-fraud culture within our community by publicising the impact of fraud on the community. We will also seek to assist our partners and our community to understand and reduce fraud risks through a programme of awareness training. Furthermore, we will seek to deter fraudsters through specific publicity and general campaigns.

Central Bedfordshire takes a holistic approach to anti-fraud measures. Fraud prevention and system security is an integral part of the development of new systems and ongoing operations. Managers will consider the fraud risks and take advice where appropriate when implementing any financial or operational system.

The holistic approach extends to the investigation of allegations and the prevention of fraud through system reviews. The Internal Audit team provide the Council's fraud investigation and system audit functions in a seamless manner. They employ a multi-disciplinary approach to the deterrence, prevention, detection, investigation, sanctions and redress of fraudulent activity. In addition, the team are free to work with other

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agencies in the pursuance of Central Bedfordshire's anti-fraud aims.

### **Deterrence - The Corporate Framework**

Central Bedfordshire takes ultimate responsibility for the protection of our finances and those that are administered on behalf of the Government or the Community. In turn, our managers have a duty to protect their service area from losses due to fraud and irregularity and are responsible for implementing proper internal controls.

The corporate framework, which underpins the operation of the Council, has a number of facets that exist to protect the Council against losses from fraud and act as a deterrent. These include:

- An established Standards Committee and an adopted code of conduct for Members.
- Members formally signing a declaration accepting the terms of the code of conduct.
- The constitution, financial regulations, standing orders and the scheme of delegation.
- Constitution arrangements which are disseminated to the public, partners, members and staff.

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- Internal control reviews by Internal Audit and Risk Team.
- A confidential reporting code (“whistleblowing” procedure).
- An anti-fraud and corruption policy.
- Policies on the Proceeds Of Crimes Act (POCA) and the Regulation of Investigatory Powers Act (RIPA), and Money Laundering
- Data Protection procedure
- A complaints procedure.
- Relevant documents being made available to the public, partners, staff and members.
- Training for staff and members on the corporate strategy documents and what the arrangements mean for their behaviour.
- Monitoring and testing of the operation of the ethical framework.

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- A dedicated team within the Internal Audit and Risk Management team whose work programmes includes proactive work.
- Participation in national anti-fraud initiatives and organisations like the CIPFA Better Governance Forum Counter Fraud Advisory Panel.
- The promotion of awareness of anti fraud and corruption issues reinforced by training and publicity.
- Effective disciplinary procedures as detailed in the staff handbook.
- Effective recruitment procedures.

The respective roles and responsibilities of stakeholders are detailed within this document. For clarity, the specific responsibilities are summarised at Appendix B.

### **The Fraud Risks:**

Central Bedfordshire is responsible for the proper administration of its finances. This not only includes direct income and expenditure but also that which we administer on

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behalf of the Government, on behalf of our clients and that for which we are the responsible accountable body. Fraudsters attack all of these sources of income and expenditure and our valuable assets.

Central Bedfordshire will be vigilant in all of these areas and will apply the same principles of deterrence, prevention, detection, investigation, sanctions and redress across all its services. The Council will not be afraid to tackle difficult or uncomfortable cases and will take a robust line and seek the maximum appropriate sanctions and redress in all areas of operation.

### **Members**

Our Members are expected to act in a manner which sets an example to the community whom they represent and to the staff of Central Bedfordshire who implement their policy objectives.

### **Prevention**

Our Members will comply with the Code of Conduct for Members and any ancillary codes that we implement. We will provide fraud awareness training to our Members and encourage an open and honest dialogue between Members and Officers.

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These matters and other guidance are specifically brought to the attention of Members at the induction course for new Members and are in each Member's Handbook. We will ensure that the processes that are particularly vulnerable, such as planning, licensing, and disposals and tendering are adequately protected through internal control mechanisms.

### **Detection**

Through Internal Audit and Risk Management reviews and the work of the Monitoring Officer we will ensure that the possibility of fraud is considered in all vulnerable areas and appropriate tests are devised to detect fraud.

### **Investigation**

Allegations of fraud and corruption made against our Members will be fully investigated in accordance with the provisions of the Local Government Act 2000 and any subsequent statute or codes of practice. The Standards Committee is responsible for the initial assessment into allegations of members' breach of the Code of Conduct.

The Council will fully assist the Standards Committee or other law enforcement

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agencies with any investigation concerning a Member.

Allegations about Members that are received by the Internal Audit and Risk team will be referred immediately to the Monitoring Officer. The Monitoring Officer may utilise the Internal Audit and Risk team for the purposes of any investigation.

### **Sanctions and Redress**

The Council will utilise its own Standards Committee to the fullest extent to promote high standards and regulate the conduct of our Members and will take action as required by the Standards Board for England.

### **Staff**

Our officers are expected to conduct themselves in ways which are beyond reproach, above suspicion and fully accountable. No financial malpractice will be tolerated and those found guilty of it will be pursued, so that the most appropriate and severe sanctions are applied.

There is a special responsibility on our Central Bedfordshire Management Team (CBMT), Assistant Directors and Monitoring Officer to lead their staff by example. The

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Council expects these officers to set the standard by their own behaviour. This includes practicing the Nolan's principles of public life. (The Seven Principles of Public Life, identified by Nolan, are set out at Appendix A).

It is the responsibility of directors and managers to be aware of the appropriate financial and other anti-fraud regulations and to be responsible for raising awareness of and ensuring conformance to them by the staff for whom they are responsible.

### **Prevention**

We recognise that our systems are vulnerable from attack from within the organisation. Particularly by those fraudsters who gain inside knowledge of control weaknesses through their official position. Prevention is better than cure and all managers must ensure that as far as possible their systems are adequately protected by sound internal controls. It is the responsibility of all managers to establish and maintain systems of internal control and to ensure that the Council's resources are properly applied and on the activities intended. This includes responsibility for the prevention and detection of fraud, corruption and financial malpractice.

We will ensure that an adequate and effective internal audit is undertaken of the Council's systems and processes. Internal Audit provides a seamless operation to

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assist managers to implement proper controls and remedy control failures.

We will ensure that procedures relating to recruitment, staff conducts and disciplinary processes are robust and are followed. With regard to the vetting of new entrants, references will be taken in all cases and personal testimonials will not be accepted. Where qualifications are required for a particular post, candidates will be required to submit original certificates for checking. If a doubt arises as to the authenticity of a qualification, this will be verified with the examination board / professional body.

Where posts involve positions of trust, such as cash handling, legal or accountancy posts, reference checks with previous employers will incorporate specific questions as to the integrity of the applicants.

Where agency staff are being employed in positions where they have access to finance, personal data or other assets, their references will be checked direct with their previous employer. The Council will not rely on references supplied by staffing agencies.

Where necessary, officers will undertake checks with the Criminal Records Bureau (CRB).

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## Detection

All internal audit reviews will have regard to the possibility of fraud. Auditors and Investigators will receive reciprocal training to ensure that both have a full understanding of system controls and potential fraud areas. We will undertake a series of proactive anti-fraud audits in high risk areas with a view to uncovering fraud and misappropriation.

The Council actively encourages the reporting of suspected acts of fraud or impropriety whether they be committed by colleagues or members. . All members of staff, the public and Councillors are encouraged to contact the Internal Audit and Risk team with any suspicion of fraud, corruption, financial malpractice or the misuse of official position. A free phone facility and an e-mail address is available for residents to contact the Internal Audit team.

In addition the Council operates a Confidential Reporting Code (Whistleblowing Policy) for those employees who wish to utilise the protection offered by the Public Interest Disclosure Act 1998.

We will utilise all methods available to detect fraud. This includes data matching, open source research, surveillance and intelligence led investigation. We will also actively

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participate in the Audit Commission's National Fraud Initiative (NFI).

### Investigation

The Internal Audit team is charged with leading on any suspected issues of fraud or irregularity. The team works to the Assistant Director, Audit and Risk and will be free to examine all allegations of fraudulent, financial misconduct, corruption and other behaviour affecting the finances or integrity of the Council.

The team will investigate any allegation that may have a direct or indirect impact on the finances for which we are responsible. This will include cases where staff may have financial information relating to organisations which are, or have been, funded by the Council or with whom the Council have a contract. Staff have a duty to assist the Council with any matter under investigation. Failure to assist with an investigation may be considered as a breach of trust or failure to comply with financial regulations. This could lead to disciplinary action being taken.

### Sanctions and Redress

We will seek the strongest available sanctions against staff who commit fraud against

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the Council, its clients or the public purse. This may include disciplinary action, prosecution and civil proceedings. Employees found guilty of gross misconduct at disciplinary for offences of fraud, theft, serious financial malpractice, using their position for personal gain or for the gain of others, will be subject to the Council's formal processes. This applies to employees who improperly benefit from the Council as a corporate body and not just those who steal funds from their own unit. It also applies to employees who defraud or steal from the Council's clients. We may also take disciplinary action against staff who commits fraud against other Local Authorities, or any other agency administering public funds.

At the conclusion of each investigation, the Investigator will produce a report. The manager whose responsibility encompasses the area of that investigation will formally accept the report and take the appropriate action (disciplinary or other). If the Assistant Director, Audit and Risk is not satisfied that the appropriate action has been undertaken they will refer the matter to the Director of Corporate Resources.

As with all disciplinary matters, the level of proof required is that of the balance of probability. Disciplinary cases involving allegations of fraud, corruption and financial malpractice will be handled on this basis.

The decision to refer the matter on for further action, such as prosecution, will be taken

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by the Director of Corporate Resources and the Council's Monitoring Officer upon a recommendation from the Assistant Director Audit and Risk in accordance with any prosecution policy in force at the time.

Internal Audit will highlight any system weaknesses that are identified as a result of an investigation. These will be addressed through an agreed action plan. The relevant service area manager is responsible for implementing the action plan. The Internal Audit and Risk team will monitor implementation of agreed actions. Failure to implement adequate system controls following a loss to fraud will be the subject of a report to the relevant Director, CBMT and/or Committee. All potential misconduct cases must be handled using the Authority's Disciplinary Procedure and Internal Audit's investigating officers will liaise with line managers and Human Resources advisers to ensure effective use of the Authority's procedures.

### **Contractors and Partners**

Those organisations undertaking work on behalf of the Council are required to maintain strong anti-fraud principles. We are happy to work with such organisations and to provide advice on anti-fraud measures. Through contract documentation we will ensure that our partners take the issue of fraud seriously. Our contractor partners will be expected to have adequate recruitment procedures and controls when they are

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handling finance on behalf of the Council. This expectation will be written into all contract terms and agreements.

### **Prevention**

We will expect our partners to have adequate controls in place to minimise fraud. We will provide fraud awareness training to our partners as required. We will also provide support and training to our community partners to help them implement proper controls and protect the funds they administer.

### **Detection**

Where our partners are involved with the administration of our finances, or those for which we have responsibility, we will conduct internal audit reviews and pro-active anti-fraud exercises as we would for our own service areas.

### **Investigation**

Our partners will provide full access to their financial records, as they relate to our finances, and their staff will be required to assist fully with any investigation. These conditions will be included in any contract terms or agreements. Personnel records of

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any person suspected of being involved in fraud will be made available to Internal Audit.

### **Sanctions and Redress**

We will seek the strongest available sanctions against contractor staff who commit fraud against the Council or who commit fraud against the public purse. We may request that the organisation takes appropriate disciplinary action against the individual and / or we may require that they are removed from the Central Bedfordshire account. The ability to request removal of staff will be written into contract terms.

At the conclusion of each investigation, the Investigator will produce a report. The manager whose responsibility encompasses the area of that investigation will formally accept the report and take the appropriate action (disciplinary or other). If the Assistant Director Audit and Risk is not satisfied that the appropriate action has been undertaken, they will refer the matter to the relevant Commissioning/Contract Manager and ultimately the Director for the relevant service as well as the Director of Corporate Resources.

The decision to refer the matter on for further action, such as prosecution, will be taken by the Assistant Director Audit and Risk in consultation with the Director of Corporate

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Resources, Service Director and the Monitoring Officer, in accordance with any prosecution policy in force at the time.

System weaknesses identified as a result of fraud investigations will be highlighted by Internal Audit. The partner organisation will be expected to address these issues. Failure to implement adequate system controls following a loss to fraud will be the subject of a report to the Service Director, CBMT and/or Committee.

All partners and contractors will be responsible for any losses affecting Council funds attributable to their employees. This will be written into contract terms.

### **The Public and External Organisations**

Members of the public receive financial assistance and benefits from the Council through a variety of sources. These include Council Tax Benefit, National Assistance and Children's Act payments, and various Grants. Unfortunately, all of these areas have been the subject of attack by fraudsters. This means less money is available for those in genuine need. Our fraud effort will be balanced against our desire to ensure genuine claimants receive their full entitlement. We will apply the same principles in dealing with fraud in all of areas of expenditure that directly support the community.

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## Prevention

We will implement strong systems of verification of all claims for all types of financial assistance. We will utilise all data available to corroborate information given by applicants for the purposes of prevention and detection of fraud. We will also monitor and review grants and assistance given to external organisations to ensure applications are genuine. All our staff involved in assessing applications will be given ongoing fraud awareness training.

## Detection

We will utilise formal referral procedures for all assessment staff and encourage early referral of suspected cases.

We will participate in national and local initiatives, including data matching and work with all Government agencies to detect and prevent fraud and other crimes affecting the well-being of our community.

We will analyse fraud trends in order to identify high risk areas and undertake proactive anti-fraud drives based on that analysis.

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We encourage the public to make use of our 24 hours free fraud hotline **0800 587 8277** and our e-mail address "**tellusaboutfraud@centralbedfordshire.gov.uk**" to report any suspected fraud. We will evaluate all referrals received from members of the public and commence investigation into all appropriate cases.

## Investigation

Internal Audit are responsible for investigating all allegations of fraud, with the exception of Housing Benefits. A dedicated Team has been established for investigations in this area. Internal Audit will work with other public sector bodies including; the Department of Work and Pensions (DWP), the Police, Revenue & Customs and the Immigration Service for the purposes of preventing, detecting and investigating crime. The Council is a member of the CIPFA Counter Fraud Group. Internal Audit will liaise with these agencies while utilising their services, where applicable, to undertake their investigations.

## Sanctions and Redress

We intend to apply a sanction in all appropriate cases of fraud and attempted fraud. This will range from official warnings to criminal prosecution. In all cases, we will seek recovery of any fraudulently obtained amounts and we will utilise all means available to

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us to recover these amounts. This will include freezing assets, confiscation orders, civil litigation and general debt recovery.

We will use the Council's own legal team, external legal advisors and the police to bring offenders to justice. Prosecution will include any instance where the Council has been deceived into providing assistance.

As a deterrent, we may also publicise our successful sanctions in the local press.

## **Anti-fraud Strategy Part 2**

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### **Prosecution Policy**

#### **Introduction**

The Council's anti-fraud policy and strategy sets out our aims and objectives with regard to tackling fraud and corruption. It states that we will seek the strongest possible sanction against any individual or organisation that defraud, or seek to defraud the Council. The use of sanctions will be governed by the following policy and the principles of the policy shall apply equally to any fraud against the Council or against

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funds for which the Council has responsibility.

#### **Objectives**

The objectives of this policy are:

1. To ensure that the Council applies a full range of sanctions in a just and consistent manner.
2. To ensure that sanctions are applied in an effective and cost efficient manner.
3. To ensure that the sanction decision making process is stringent, robust and transparent.

This policy is designed to provide a framework within which to ensure the most appropriate resolution to a case is reached. The sanction decision will have regard at all times to the Council's disciplinary policy and anti-fraud policy objectives, the individual circumstances of each person concerned and the overall impact of the punishment to both the individual and the community.

A range of sanctions is available to the Council. These include disciplinary action, civil proceedings, criminal proceedings, official cautions and administrative penalties.

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The ultimate sanction available to the Council is criminal prosecution. We recognise that this is a serious step to take and the decision to refer cases for prosecution will not be taken lightly.

In some cases, the ultimate decision on prosecution will be taken by the Crown Prosecution Service. This will be as a result of a referral of cases to the Police. We will utilise the Police in cases where their additional powers are required to secure evidence or recovery of funds or where the matter is considered too serious to be pursued in-house.

We will utilise the Council's Legal Service and external legal advisors to undertake criminal prosecution and civil proceedings. In these cases, the decision to refer cases for prosecution will be taken by the Assistant Director Audit and Risk in consultation with the Director of Corporate Resources, the Service Director and the Monitoring Officer.

In appropriate cases, we will also utilise the prosecution arm of other public agencies. This will usually be for cases involving joint investigations.

When considering a case for prosecution, it is generally accepted that there are two

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“tests” to be applied – the evidential test and the public interest test. Only when both these tests are satisfied can a case be considered suitable for prosecution.

### **Evidential Test**

Is there enough evidence to provide “a realistic prospect of conviction”?

In order to ensure that a “realistic prospect of conviction” exists, officers of the Internal Audit team will at all times ensure that investigations are conducted in accordance with relevant legislation and in line with published Codes of Practice and Guidance with regard to evidence gathering, interviewing and rules of disclosure.

The Council does not have the resources of the police and CPS available to it and to ensure the cost effectiveness of actions, will require the evidence to be of a standard to make the prospect of a conviction highly likely.

The evidence gathered will be examined in the first instance by the investigator and their manager. When both are satisfied that sufficient evidence exists to successfully prosecute and that the Public Interest test is also satisfied, in consultation with the Council's legal team and any external advisors, the case file will be passed on to the police for investigation. Both the Council's Legal team and the CPS will apply their own

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inspection of the evidence to ensure that a realistic prospect of conviction exists.

### Public interest Test

In order to ensure consistency and correctness when considering a case for Sanction / Prosecution, the guidelines applied by the Crown Prosecution Office – as detailed in Section 10 Prosecution of Offences Act 1985 will be followed by officers of the Internal Audit team. In addition, the guidance provided by relevant Government agencies on prosecution will also be considered.

### Public interest Factors

- A conviction is likely to result in a significant sentence.
- The defendant was in a position of authority or trust.
- The evidence shows that the defendant was a ringleader or an organiser of the offence.
- There is evidence that the offence was premeditated.

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- There is evidence that the offence was carried out by a group.
- The defendant's previous convictions or cautions are relevant to the present offence.
- There are grounds for believing that the offence is likely to be continued or repeated, for example, by a history of recurring conduct; or the offence, although not serious in itself, is widespread in the area where it was committed.
- Aggravating and mitigating factors will be taken into consideration when deciding on the appropriate sanction.

### Officer Fraud and Corruption

In all cases of fraud, financial misconduct, serious and intentional breach of financial regulations and corruption committed by officers we will seek disciplinary action. The normal recommendation would be gross misconduct.

Where a financial loss has been identified, we will always seek to recover this loss either through the civil or criminal process.

Fraud committed by officers will also be considered for criminal prosecution.

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The factors that will affect our decision to prosecute will be based on the evidential and the public interest test. We will seek prosecution in all cases involving theft from vulnerable clients or where there is evidence of corruption of public officials.

### **Anti-fraud Strategy Part 3**

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#### **Fraud Response Plan – Internal Fraud**

Part three of the strategy explains how managers should deal with suspicions of fraud and what steps they should take on discovering a fraud. For operational reasons, this section has been omitted from this publication and has been circulated separately to Service Area Managers.

### **Anti-fraud Strategy Part 4**

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#### **Further Information:**

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#### **24 Hours CBC Fraud Hotline**

TEL: 0800 587 8277.

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## APPENDIX A

### **Nolan Committee Report – The Seven Principles of Public Life**

#### **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, or recommending individuals for rewards and benefits, holders of public office should

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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 action that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

#### **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**

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Holders of public office should promote and support these principles by leadership and example.

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## APPENDIX B

| Stakeholder   | Specific Responsibilities  |
|---|--|
| Chief Executive                                       | Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud and corruption.  |
| Monitoring Officer                                    | 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. |
| Director of Corporate Resources (Section 151 Officer) | To ensure the Council has an adequately resourced and effective  |

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|                     |   |
|---------------------|---|
|                     | Counter Fraud and Internal Audit and Risk Management Service.   |
| Audit Committee     | To monitor the Council's policies and consider the effectiveness of the arrangements for Counter Fraud and Whistleblowing.  |
| Standards Committee | The Committee monitors and advises upon the content and requirement of Codes, Protocols and other procedures relating to standards of conduct throughout the Council. |
| Councillors         | To support and promote the development of a strong counter fraud culture.   |
| External Audit      | Statutory duty to ensure  |

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|                              |   |
|------------------------------|---|
|                              | that the County Council has in place adequate arrangements for the prevention and detection of fraud, corruption and theft.   |
| Internal Audit and Risk Team | Responsible for developing and implementing the Anti Fraud Strategy and investigating any issues reported under this policy and the Confidential Reporting (Whistleblowing) Policy. To ensure that all suspected or reported irregularities are dealt with promptly and in accordance with this policy and that action is |

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|          |   |
|----------|---|
|          | identified to improve controls and reduce the risk of recurrence.   |
| Managers | To promote staff awareness and ensure that all suspected or reported irregularities are immediately referred to Internal Audit. 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. |
| Staff    | To comply with Council policies and procedures, to be aware of the possibility of fraud,  |

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|  |   |
|--|---|
|  | corruption and theft, and to report any genuine concerns to the appropriate management, the Chief Executive, the Director of Corporate Resources, the Monitoring Officer, or the Internal Audit and Risk team . |
| Public, Partners, Suppliers, Contractors and Consultants | To be aware of the possibility of fraud and corruption against the Council and report any genuine concerns or suspicions.   |

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## **CONFIDENTIAL REPORTING** (Also known as 'Whistle Blowing')

- 1.0 **Introduction**
- 1.1 Central Bedfordshire Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others that we deal with who have serious concerns about any aspect of the Council's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.
- 1.2 Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 1.3 The Public Interest Disclosure Act 1998 encourages individuals to raise concerns about malpractice in the workplace and this policy document makes it clear that employees can raise serious concerns without fear of victimisation, subsequent discrimination or disadvantage and is intended to encourage and enable

employees to raise those concerns within the Council, rather than overlooking a problem.

- 1.4 The Policy applies to all employees and those contractors working for the Council on Council premises, for example, agency staff, builders, and drivers. It also covers suppliers and those providing services under a contract with the Council in their own premises, for example care homes. Members of the public are also encouraged to raise concerns, which will be responded to in accordance with this policy.
- 1.5 These procedures are in addition to the Council's complaint procedures and other statutory reporting procedures applying to some service areas. Service managers are responsible for making service users aware of the existence of these procedures if and when necessary.
- 1.6 This policy has been discussed with the relevant trade unions and professional organisations and has their support.
- 2.0 **Aims and Scope of this Policy**
- 2.1 This policy aims to:-
- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice

- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

2.2 There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The Confidential Reporting Policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damages to the environment
- the unauthorised use of public funds
- possible fraud and corruption
- sexual or physical abuse of clients, or
- other unethical conduct

2.3 Thus any serious concerns that you have about any aspect of service provision or the conduct of officers or members of the Council or others acting on behalf of the Council can be reported under the Confidential Reporting Policy. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Council subscribe to; or
- is against the Council's Standing Orders and policies; or
- falls below established standards of practice; or
- amounts to improper conduct.

2.4 This policy does not replace the corporate complaint procedure.

### 3.0 Safeguards

#### 3.1 Harassment or Victimisation

3.2 The Council is committed to good practice and high standards and wants to be supportive of employees.

3.3 The Council recognises that the decision to report a concern can be a difficult one to make. If you make an allegation in good faith you will have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

3.4 The Council will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect you when you raise a concern in good faith.

3.5 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

**4.0 Confidentiality**

4.1 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, i.e. if and when, the matter goes to an investigatory stage and a disciplinary hearing, however, you may need to come forward as a witness.

**5.0 Anonymous Allegations**

5.1 This policy encourages you to put your name to your allegation whenever possible.

5.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Council.

5.3 In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and

- the likelihood of confirming the allegation from attributable sources.

**6.0 Untrue Allegations**

6.1 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however, you make an allegation maliciously or for personal gain, disciplinary action may be taken against you. (The Council will manage such situations using its agreed Disciplinary Procedure).

**7.0 How to raise a concern**

7.1 As a first step, you should normally raise concerns with your immediate manager or their superior. This depends however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the Chief Executive, Director of Corporate Resources, the Council's Monitoring Officer or the Assistant Director Audit and Risk. .

7.2 Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);

- the reason why you are particularly concerned about the situation.

All concerns received will be registered immediately with the Monitoring Officer.

- 7.3 The earlier you express the concern the easier it is to take action.
- 7.4 Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for you concern.
- 7.5 Advice and guidance on how matters of concern may be pursued can be obtained from:
- Monitoring Officer
  - Director of Corporate Resources
  - Assistant Director (Audit and Risk)
  - Assistant Director ( Human Resources and Organisational Development )

- 7.6 You may wish to consider discussing your concern with a colleague or your trade union representative first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. *However, once you have raised a concern under the Confidential Reporting Policy you should be mindful that any further*

*discussions with other parties may impede the maintenance of confidentiality.*

- 7.7 You may invite your trade union or friend to be present during any meetings or interviews in connection with the concerns you have raised.

#### 8.0 How the Council will respond

- 8.1 The Council will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

- 8.2 Where appropriate the matters raised may:

- be investigated by management, internal audit, or through the disciplinary process
- be referred to the police
- be referred to the external auditor
- form the subject of an independent inquiry

- 8.3 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the Council will have in mind, is the public interest. Concerns or allegations, which fall within the scope of specific procedures (for example, child protection or discrimination

## APPENDIX C

- 8.7 Where any meeting is arranged, off-site if you so wish, a union or professional association representative or a friend can accompany you.
- 8.8 The Council will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Council will arrange for you to receive advice about the procedure.
- 8.9 The Council accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcomes of any investigation.
- 9.0 The Responsible Officer**
- 9.1 The Monitoring Officer has overall responsibility for the maintenance and operation of this policy. That officer maintains record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Council.
- 10.0 How the matter can be taken further**
- 10.1 This policy is intended to provide you with an avenue within the Council to raise concerns. The Council hopes you will be satisfied with any action taken. If you are not, and if you

## APPENDIX C

- issues), will normally be referred for consideration under those procedures.
- 8.4 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.
- 8.5 Within ten working days of a concern being raised, the Monitoring Officer will write to you:
- acknowledging that the concern has been received
  - indicating how we propose to deal with the matter
  - giving an estimate of how long it will take to provide a final response
  - telling you whether any initial enquiries have been made
  - supply you with information on staff support mechanisms, and
  - telling you whether further investigations will take place and if not, why not.
- 8.6 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Council will seek further information from you.

feel it is right to take the matter outside the Council, possible contact points are set out in *paragraph 10.3*.

10.2 Before taking matters outside the Council you may wish to take independent advice and the charity Public Concern at Work (telephone 0171 404 6609) offers such facilities to employees.

10.3 The following are possible external contact points:

- the Council's external auditor
- your trade union/professional association representative
- your local Citizens Advice Bureau
- relevant professional bodies or regulatory organisations
- a relevant voluntary organisation
- the police

10.4 If you do take the matter outside the Council, you should ensure that you do not disclose confidential information

#### Further Information:

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**24 Hours BCC Fraud Hotline**

TEL: 0800 587 8277.

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APPENDIX C

10.5 .

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