
Meeting: Audit Committee
Date: 23 January 2012
Subject: Revised Anti-Fraud and Confidential Reporting Policies
Report of: Chief Finance Officer
Summary: The Anti-Fraud and Corruption Strategy (including Anti-Bribery) and Confidential Reporting Policy have been updated to reflect changes in legislation and roles and responsibilities.

Contact Officer: Kathy Riches, Head of Internal Audit and Risk
Public/Exempt: Public
Wards Affected: All
Function of: Audit Committee

CORPORATE IMPLICATIONS

Council Priorities:

The implementation of a robust anti-fraud culture supports all the Council's key priorities by encouraging probity and accountability across the Council.

Financial:

1. None directly from this report.

Legal:

2. These policies are key parts of the Council's Ethical Governance Framework and provide an element of assurance in respect of the Council's fiduciary duty to the Council tax payers.
3. The Confidential Reporting Policy ensures that the Council complies with its obligations in respect of protected disclosures under the Employment Rights Act 1996, and discharges its obligations under the Public Interest Disclosure Act 1998.
4. The revised Anti Fraud And Corruption Policy (including Anti Bribery) addresses the Council's obligations under the Bribery Act 2010.

Risk Management:

5. None directly from this report.

Staffing (including Trades Unions):

6. Trade unions were consulted on the original policies.

Equalities/Human Rights:

7. None directly from this report.

Community Safety:

8. None directly from this report.

Sustainability:

9. None directly from this report.

RECOMMENDATION:

That the Audit Committee approves the proposed revisions to the Anti-Fraud and Corruption Strategy and Confidential Reporting Policy.

Background

10. The Audit Committee, at its meeting on 17th July 2009, approved both the Anti-Fraud and Corruption Strategy and the Confidential Reporting Policy. Both policies were approved by Full Council on 19th November 2009.
11. Both policies are contained within the Constitution. The Confidential Reporting Policy is included within the Ethical Framework section whilst the Anti-Fraud and Corruption Strategy is included within the Finance, Contracts and Legal section.
12. The documents have been refreshed to ensure that they are up to date and reflect current legislation and reporting channels within the Council.

Anti Fraud and Corruption Strategy (Including Anti-Bribery)

13. The Anti-Fraud and Corruption Policy sets out in detail the Council's approach to dealing with suspected fraud, corruption, and misappropriation across the organisation, including members, officers, contracting partners and external individuals and organisations.
14. Since the policy was produced in July 2009, there have been a number of changes in reporting channels within the Council, and the updated policy reflects these changes.
15. The Bribery Act 2010 came into force on 1st July 2011. The revised Anti-Fraud and Corruption Strategy includes an appendix to reflect the requirements of the Act. A training session for Audit Committee members held in October considered the Bribery Act in detail.
16. The updated policy also reflects the changes in responsibilities of the Standards Committee.

Confidential Reporting Policy

17. 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 individuals to raise concerns within the Council.
18. The policy has been revised to reflect current roles and responsibilities.

Conclusion and Next Steps

19. Central Bedfordshire Council is committed to the highest possible standards of openness, probity and accountability. The Anti-Fraud and Corruption Policy (including Anti-Bribery) and the Confidential Reporting (Whistle Blowing) Policy are two key documents which contribute to promoting a robust but fair anti fraud culture.
20. The revised policies, once approved, will replace the current policies on the Council's Intranet, and will be published on the Central Bedfordshire Website.

Appendices:

Appendix A – Anti-Fraud and Corruption Strategy (including Anti-Bribery) December 2011

Appendix B – Confidential Reporting Policy (also known as “Whistle Blowing”) December 2011

Background Papers: None

Location of papers: N/A