



Strategy for the Prevention of Fraud and Corruption

Purpose

1. This strategy has been produced to set out the principles, culture and framework within which the Council's anti fraud and corruption policies are intended to operate.
2. The strategy sets out:
 - The Anti Fraud and Anti Corruption Culture
 - The Principles of Conduct in Public Life
 - Roles and Responsibilities
 - Staff and Member Training
 - Policies, Protocols, Procedures

The Anti Fraud and Corruption Culture

3. Although it is essential that the processes and procedures to prevent, find and investigate fraud and corruption are fit for purpose, the starting point is the organisation's culture.
4. Members and staff are expected to adhere to the 10 principles of conduct in public life. They are also expected to maintain a culture of integrity and openness, and to use the available procedures to raise any concerns with managers or audit.
5. The Council will not tolerate fraud, or corruption, or attempted fraud or corruption, and will deal with it firmly. Managers are also required to be pro-active in implementing agreed audit control recommendations and addressing any serious control weaknesses that they become aware of, in a prompt and thorough manner.

The 10 Principles of Conduct in Public Life

6. Members and officers¹ are expected to follow the 10 general principles for conduct in public life.²
 - Selflessness – serve only the public interest and never improperly confer an advantage or disadvantage on any person.
 - Honesty and Integrity – don't place themselves in situations where their honesty and integrity may be questioned, don't behave improperly and, on all occasions avoid the appearance of such behaviour.

¹ In this context "officers" includes full and part time staff employed directly by the council, staff working for partnership organisations, temporary and agency staff and consultants and contractors when working on DDC business.

² Set out in the Local Government Act 2000.

- Objectivity – make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards.
- Accountability – be accountable to the public for their actions and the manner in which they carry out their responsibilities, and co-operate fully and honestly with any appropriate scrutiny.
- Openness – be as open as possible about their actions and those of the authority, and should be prepared to give reasons for those actions.
- Personal Judgement – members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.
- Respect for others – promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. Respect the impartiality and integrity of the authority's statutory officers, and its other staff.
- Duty to Uphold the Law – uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.
- Stewardship – do whatever you are able to do to ensure that their authorities use their resources prudently and in accordance with the law.
- Leadership – members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.

Roles and Responsibilities

7. The general principles and culture apply to all. All Members and officers have a duty to report concerns of fraud or irregularity and inappropriate approaches or inducements made to them in their role as Members or officers.
8. All Members and officers also have a duty to protect and conserve any records or evidence of fraud or irregularity that may be of use in an investigation, and to provide all assistance to the Head of the East Kent Audit Partnership or anyone else properly appointed to undertake an investigation.
9. No explanation of roles and responsibilities can be exhaustive, or cover all eventualities, however, certain roles and responsibilities will apply to specific individuals or groups of individuals as set out below.
 - Members

Responsible for the example they set and the culture they promote. Specific responsibility for protecting the interests of the Council and the public, registering and declaring interests, declaring Related Party Transactions and reporting any fraud or corruption of which they become aware, or any inappropriate offers or inducements made to them as councillors.
 - Chairman and Members of Governance Committee

The Chairman and Members of Governance have a specific role in ensuring that the Council has an effective internal audit service, appropriate systems, processes and controls in place, a suitable organisation structure, appropriate delegation of responsibilities and duties and adequate separation of duties, sufficient and appropriate to

recognise, mitigate and report all significant risks and to minimise the risk of fraud and corruption, and to deal with it appropriately when it arises.

- Directors / Chief Officers / Heads of Service

In addition to the responsibilities applying to Members, senior staff are responsible for identifying risks from fraud and irregularities and taking proportionate steps to mitigate those risks, including the maintenance of systems and controls to prevent fraud, promotion of the appropriate culture amongst staff and providing staff with the required training and the processes that encourage staff to report any fraud or corruption of which they become aware. They are also responsible for compliance with the Council's constitution including Contract Standing Orders and Financial Procedure Rules.

- Director of Governance

The Director of Governance is responsible for advising Members on the guidelines and codes for appropriate and ethical behaviour and for ensuring that adequate resources are made available to Members, including relevant training.

- Head of the East Kent Audit Partnership (HEKAP)

The HEKAP is responsible for building and delivering the audit plan in consultation with senior managers, based on an assessment of risk, including risks arising from services, business activities and posts which are considered to be vulnerable to fraud and corruption.

The HEKAP's role also includes the receipt, investigation and reporting of allegations of fraud or corruption against Members and / or officers. All investigations will be undertaken in accordance with legislation and best practice.

The HEKAP reports to Governance Committee and has direct access to the Chairman of Governance or any other member if an issue required it.

- Director of Finance, Housing and Community (DoF) and Financial Services Manager (FSM)

In addition to the responsibilities of Directors / Chief Officers / Heads of Service, the DoF is responsible for monitoring compliance with Contract Standing Orders and Financial Procedure Rules. The DoF and FSM also act as Money Laundering Reporting Officer and Deputy Money Laundering Reporting Officer respectively.

Policies, Protocols and Procedures

10. It is essential that Members, officers and the public are provided with clear policies, protocols and procedures so that they understand:

- How to report concerns over fraud and corruption
- How those concerns should be received and investigated
- The specific measures in place to deal with money laundering
- The specific measures in place to deal with bribery.

11. In order to deal with these required policies are appended as follows:

- Whistleblowing Policy
- Protocol for Dealing with Allegations of Fraud or Corruption
- Anti Money Laundering Policy
- Anti Bribery Policy

Member, Officer and Public Awareness

12. The policies and procedures will be of little use unless they are understood and implemented / acted upon.
13. This strategy has been produced following consultation with:
 - The Portfolio Holder for Corporate Resources and Performance
 - The Chairman of Governance
 - The Director of Governance
 - The HEKAP
 - The Financial Services Manager
14. All Members will be given a briefing on the strategy and policies, and Members of Governance will receive a more detailed briefing.
15. All staff will receive an e-mail alerting them to the strategy and policies and will be required (using Net Consent) to read them.
16. The strategy and policies will be placed on the Internet and intranet so that they can be easily accessed in future.