

This report is public	
Counter Fraud Policy Update Report	
Committee	Accounts, Audit and Risk Committee
Date of Committee	20 November 2024
Portfolio Holder presenting the report	Deputy Leader of the Council and Portfolio Holder for Finance, Property and Regeneration, Councillor Lesley McLean.
Date Portfolio Holder agreed report	08 November 2024
Report of	Assistant Director of Finance, Michael Furness

Purpose of report

This report presents two updated policies, regarding the Counter Fraud and Corruption Policy, and the Anti-Money Laundering Policy, and asks the Accounts, Audit and Risk Committee to approve these policies.

1. Recommendations

The Accounts, Audit and Risk Committee resolves:

- 1.1 To note and approve the counter fraud and corruption policy.
- 1.2 To note and approve the anti-money laundering policy.

2. Executive Summary

- 2.1 It is good practice for councils to regularly review policies relating to risks of fraud and corruption. A review of current policies has recently been completed by the Council's counter fraud team (provided by Veritau). Two revised counter fraud policies (a Counter Fraud and Corruption Policy and Anti-Money Laundering Policy) have been prepared.

Implications & Impact Assessments

Implications	Commentary
Finance	There are no financial implications arising directly from this report. Joanne Kaye Head of Finance 11 November 2024
Legal	The changes to the policies provide greater clarity on how these important policies will operate, and are welcomed. Shahin Ismail, Interim Head of Legal, 12 November 2024
Risk Management	There are no risk implications arising directly as a consequence of this report. Updating aforementioned policies constitute a

	mitigating action ensures compliance and that effective process are in place to prevent and address possible fraud and corruption Celia Prado-Teeling, Performance Leader, 07 November 2024			
Impact Assessments	Positive	Neutral	Negative	Commentary
Equality Impact		X		There are no equalities implications as a direct consequence of this report. All policies are developed in line with our Equalities, Diversity and Inclusion Framework. Celia Prado-Teeling, Performance & Insight Team Leader, 07 November 2024
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		X		N/A
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		X		N/A
Climate & Environmental Impact		X		N/A
ICT & Digital Impact		X		N/A
Data Impact			X	N/A
Procurement & subsidy		X		N/A
Council Priorities	This report supports the priorities set out in the 2024/25 business plan. The counter fraud team seeks to protect council income and assets so they can help fund the objectives of the business plan. The team also supports the council's specific goal to reduce crime which forms part of its overall goal to promote healthy, resilient, and engaged communities.			
Human Resources	N/A			
Property	N/A			
Consultation & Engagement	N/A			

Supporting Information

3. Background

- 3.1 The Counter Fraud and Corruption Policy sets out the Council's approach for preventing, detecting, and deterring fraud. Furthermore, it sets out the decision-making process for cases where fraud or corruption has been found to have been committed against the Council.
- 3.2 The Anti-Money Laundering Policy describes how money laundering may affect the Council and the arrangements in place for reporting any suspicions. The Council has obligations under legislation to take action when concerns relating money laundering are raised. The action taken should be both considered and timely. If action is delayed or does not take place, then the Council can suffer financial and reputational damage.

4. Details

- 4.1 The Council's Anti-Fraud and Anti-Corruption Strategy was last updated in July 2021, and its Anti-Money Laundering Policy and Procedures was last updated in July 2020. A review of the current strategies has been undertaken by Veritau. A number of updates are proposed to meet current best practice.
- 4.2 The proposed changes for the revised Counter Fraud and Corruption Policy include:
- Updating the contact information for reporting allegations of fraud to reflect the Council's new counter fraud provider, and relevant changes in government departments.
 - A clearer distinction in investigatory procedures regarding criminal and civil investigations versus investigating whistleblowing referrals.
 - A standalone policy regarding anti-bribery procedures.
 - Providing the decision-making framework for investigation outcomes, including criminal prosecutions.
- 4.3 The proposed changes for the revised Anti-Money Laundering Policy include:
- Providing a clearer reporting process to ensure all concerns are raised with the Money Laundering Reporting Officer (MLRO).
 - Providing an updated Suspicious Activity Reporting (SAR) Form.

5. Alternative Options and Reasons for Rejection

- 5.1 The nature of this report is such that alternative options are not appropriate.

6 Conclusion and Reasons for Recommendations

6.1 The Accounts, Audit and Risk Committee is recommended to note and approve the revised policies.

Decision Information

Key Decision	N/A
Subject to Call in	N/A
If not, why not subject to call in	N/A
Ward(s) Affected	All

Document Information

Appendices	
Appendix 1	Counter Fraud and Corruption Policy
Appendix 2	Anti-Money Laundering Policy
Background Papers	None
Reference Papers	None
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Corporate Director Approval (unless Corporate Director or Statutory Officer report)	Report of Statutory Officer, Section 151 Officer