

BRECKLAND DISTRICT COUNCIL

Report of: Christine Marshall, Executive Director Commercialisation

To: Governance and Audit Committee, 15 February 2019

Author: Christine Marshall, Executive Director Commercialisation

Subject: Counter Fraud Corruption and Bribery Policy, Whistleblowing Policy and Money Laundering Policy

Purpose: To review and recommend for approval the updated Counter Fraud Corruption and Bribery Policy, Whistleblowing Policy and Money Laundering Policy

Recommendation(s):

- 1) That the policies are reviewed by Governance and Audit Committee

Recommend to FULL COUNCIL:

- 2) That the Counter Fraud Corruption and Bribery Policy is approved
- 3) That the Whistleblowing Policy is approved
- 4) That the Money Laundering Policy is approved

1.0 BACKGROUND

- 1.1 The attached policies were last fully reviewed and updated in 2016, in the interim period up to now they have been updated for small changes such as staff names as people have changed roles. This report and the associated appendices are the result of a full review which should be undertaken at least every 3 years.
- 1.2 The policies have remained fairly similar in scope and coverage as the legal background has not changed significantly since 2016. The main changes made are:
 - Changes to contact details for Officers and outside organisations
 - Review and inclusion of any General Data Protection Regulations (GDPR) implications
 - Update the name of Public concern at Work (PCaW) to their new name of ProtectThe policies have been updated in conjunction with Internal Audit, Legal Services and Human Resources to ensure the fullest policy coverage.
- 1.3 It is difficult to gauge how well these policies have worked in the past as the focus is on prevention and identification of fraud and a whistleblowing policy which people are willing to use. There is no data available to judge performance, however this review ensures that the policies remain up to date and focussed on the Council.
- 1.4 Once the policies have been approved, e-learning training will be rolled out to relevant employees and Members. ARP have their own more detailed training in these areas which is tailored directly to their work, so they are not included in this more generic training.

2.0 **OPTIONS**

- 2.1 To review and recommend to Full Council for approval the; Counter Fraud Corruption & Bribery Policy; Whistleblowing Policy; and Money Laundering Policy.
- 2.2 To review but not recommend to Full Council for approval the; Counter Fraud Corruption & Bribery Policy; Whistleblowing Policy; and Money Laundering Policy.
- 2.3 To review and recommend to Full Council for approval with enhancements the; Counter Fraud Corruption & Bribery Policy; Whistleblowing Policy; and Money Laundering Policy.

3.0 **REASONS FOR RECOMMENDATION(S)**

- 3.1 To reflect changes to the working environment by refreshing the policies and thereby ensuring that appropriate up to date arrangements are in place.

4.0 **EXPECTED BENEFITS**

- 4.1 To encourage the prevention and identification of fraud and corruption, to raise awareness and to provide a confidential reporting process

5.0 **IMPLICATIONS**

In preparing this report, the report author has considered the likely implications of the decision - particularly in terms of Carbon Footprint / Environmental Issues; Constitutional & Legal; Contracts; Corporate Priorities; Crime & Disorder; Equality & Diversity/Human Rights; Financial; Health & Wellbeing; Reputation; Risk Management; Safeguarding; Staffing; Stakeholders/Consultation/Timescales; Transformation Programme; Other. Where the report author considers that there may be implications under one or more of these headings, these are identified below.

5.5 **Crime and Disorder**

- 5.5.1 By reducing the risk of fraud, corruption and money laundering, the Council can help reduce the risk of crime.

5.9 **Risk Management**

- 5.9.1 Appropriate and effective whistleblowing arrangements will help reduce the risk of fraud, corruption and money laundering.

5.12 **Stakeholders / Consultation / Timescales**

- 5.12.1 In updating these policies we have consulted with Human Resources, Legal Services, the Executive Management Team and Anglia Revenues Partnership.

6.0 **WARDS/COMMUNITIES AFFECTED**

- 6.1 N/A.

7.0 **ACRONYMS**

- 7.1 MLRO – Money Laundering Reporting Officer
- 7.2 NCA – National Crime Agency
- 7.3 SOCA – Serious Organised Crime Agency

Background papers:- [See The Committee Report Guide for guidance on how to complete this section](#)

Lead Contact Officer

Name and Post: Alison Chubbock, Chief Accountant
Telephone Number: 01362 656865
Email: alison.chubbock@breckland.gov.uk

Key Decision: Yes

Exempt Decision: No

This report refers to Mandatory and Discretionary Services

Appendices attached to this report:

Appendix A Counter Fraud Corruption & Bribery Policy
Appendix B Whistleblowing Policy
Appendix C Money Laundering Policy