

Report to: **Audit and Governance Committee**

Date of Meeting: 31 January 2019

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 11

Subject: **Review of the Anti-Fraud Theft and Corruption Policy, Anti-Bribery Policy and Whistleblowing Policy**

Purpose of report: The Council's Anti-Fraud Theft and Corruption, Anti-Bribery and Whistleblowing Policies require reviewing. Having reviewed the policies the recommendation is that they all remain fit for purpose and therefore no amendments are required.

Recommendation: **That the Committee agree that following review the following policies;**

- (i) Anti-Fraud, Theft and Corruption Policy**
- (ii) Anti-Bribery Policy**
- (iii) Whistleblowing Policy**

remain fit for purpose and will continue to apply unchanged. They will be reviewed again in three years' time or earlier if circumstances require.

Reason for recommendation: The Council regularly reviews the policies, codes and procedures that govern the way we operate. This report relates to a review of three of our Key Policies; namely, the Anti-Fraud, Theft and Corruption Policy, the Anti-Bribery Policy and Whistleblowing Policy.

These policies were last reviewed and updated in March 2016 (Whistleblowing) and September 2016 (Anti-Fraud Theft and Corruption and Anti-Bribery) by this Committee. A link to the existing policies is contained in the background links.

There have been no legislative changes that would require any of the policies to be changed / updated.

In relation to the operation of the policies, there have been no instances where the Anti-Bribery Policy or the Whistleblowing Policy have had to be considered or invoked. Under the Anti-Fraud, Theft and Corruption Policy there have been three instances in the last two years where a matter has been identified that might have necessitated the calling of the Fraud Forum. In all instances it was concluded that the activities were management / staffing related matters rather than falling within the ambit of the policy.

The Serious and Organised Crime Audit (carried out by SWAP in September 2017) found the '*whistleblowing arrangements [to be] effective and guidance on reporting suspicious behaviour or activity [as] clear and effective*'. In the Healthy Organisation audit (reported to the June 2017 A & G meeting) the Council received 'high assurance' in



relation to both the Corporate Governance and Financial Management themes.

It is considered that these policies are up to date with legal requirements and remain fit for purpose. For the above reasons it is recommended that the three policies continue to apply without amendment.

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Financial implications:	There are no direct financial implications.
Legal implications:	The review indicates that no changes are required to any of the listed policies. It should be noted that the Council must adhere to any adopted policy in the circumstances where it applies but otherwise there are no legal implications arising.
Equalities impact:	Low Impact
Risk:	Low Risk
Links to background information:	<ul style="list-style-type: none">• Anti-Fraud, Theft and Corruption Policy• Anti-Bribery Policy• Whistleblowing Policy
Link to Council Plan:	Encouraging communities to be outstanding and Continuously improving to be an outstanding council