

**Report for:** Corporate Committee – 15 September 2022

**Title:** Anti-Fraud and Corruption Strategy

**Report authorised by:** Director of Finance

**Lead Officer:** Minesh Jani, Head of Audit and Risk Management

**Ward(s) affected:** N/A

**Report for Key/  
Non-Key Decision:** Information

**1. Describe the issue under consideration**

- 1.1 As part of the 2017 UK Public Sector Internal Audit Standards (PSIAS), Haringey Council needs to ensure that there are appropriate processes in place for the reporting and investigation of allegations of fraud and corruption.
- 1.2 The Corporate Committee is responsible for Anti-fraud and Corruption arrangements as part of its Terms of Reference. In order to provide assurance that the corporate policy is consistent with relevant regulations and other best practice requirements, it is reviewed on a regular basis.

**2. Cabinet Member Introduction**

- 2.1 Not applicable.

**3. Recommendations**

- 3.1 To agree the Corporate Anti-Fraud and Corruption Strategy and the following policies:
- Fraud Response Plan;
  - Whistle-blowing Policy;
  - Sanctions Policy;
  - Anti-money Laundering Policy; and
  - Anti-bribery Policy.

**4. Reasons for decision**

- 4.1 The Corporate Committee is responsible for approving the Council's Anti Fraud and Corruption Strategy under its Terms of Reference.

**5. Alternative options considered**

- 5.1 Not applicable.

## **6. Background information**

- 6.1 Haringey Council seeks to maintain high standards of probity and has put in place arrangements for protecting the public purse. Sound systems to demonstrate public accountability are also vital for effective management of services and in maintaining public confidence; the minimisation of losses from fraud and corruption is essential for ensuring resources are used for their intended purpose.
- 6.2 To investigate fraud and corruption the Council has a dedicated Corporate Anti-Fraud Team comprising six investigators and a vacant assistant investigator who undertake pro-active and reactive work across all areas of the Council's activities. Generally, local authorities have invested in London in particular, have invested in anti-fraud work consistently over many years following guidance and advice from regulatory bodies including the former Audit Commission, CIPFA, the Cabinet Office and by the National Fraud Authority in their 'Fighting Fraud Locally' publications.
- 6.3 The Council's Anti-fraud and Corruption Strategy gives guidance to relevant individuals, employees, Councillors, members of the public and organisations working in partnership with the Council, on the Council's stance on Fraud and Corruption and the steps people should take if they suspect fraud and corruption. The strategy also sets out how the Council will deal with any allegations.
- 6.4 Essentially, the strategy states the Council has a zero tolerance to fraud and corruption and the Council will use the full range of sanctions to act against individuals or organisations found to be committing fraud against the Council. Ultimately with finite resource a risk based approach is taken and an annual work plan is set each year. The Corporate Committee receive quarterly updates and an Annual Report that communicates the outcome of our work under this strategy.
- 6.5 The Council's Anti-fraud and Corruption Strategy and the related appendices are published on the Haringey website and intranet site. In addition, all policies are published separately to enable anyone searching for the individual policy to locate these easily. The website pages also provide details of how to report suspected cases of fraud and corruption.
- 6.6 The Head of Audit & Risk is the responsible for maintaining the Anti-fraud and Corruption Policy, together with all related policies: Whistleblowing, Sanctions, Anti-Money Laundering and Anti-bribery. The Head of Audit and Risk Management, in consultation with senior stakeholders, review all anti-fraud and corruption policies to ensure they reflect current legislation and recommended best practice. The most recent update incorporates the themes from the guidance document "Fighting Fraud & Corruption Locally – Strategy for the 2020s".
- 6.7 The review of the Whistleblowing policy is undertaken in consultation with the Head of Human Resources to ensure all relevant employment issues are incorporated into any changes to the policy.

6.8 The Council's Anti-fraud and Corruption Strategy follows the Chartered Institute of Public Finance and Accountancy's (CIPFA) guidance and best practice recommendations. The Council's Whistle-blowing policy conforms to the best practice guidance issued by Public Concern at Work, the independent charitable organisation which advises on whistleblowing and governance matters.

**7. Contribution to strategic outcomes**

7.1 The Council has an important role to demonstrate stewardship of the public purse. The management of fraud risks is an important part of the Council's work to enable the Council to utilise its resources to achieve its corporate aims.

**8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)**

**8.1 Finance and Procurement**

There are no direct financial implications arising from this report. The strategies will be implemented within existing agreed budgets.

**8.2 Legal**

The Head of Legal and Governance has been consulted in the preparation of this report, and in noting that the policies, plan and strategy follow legislative requirements / industry guidance and best practice, has no comments.

**8.3 Equality**

There are no direct equality implications for the Council's existing policies, priorities and strategies as a result of this report. However, ensuring that the Council has effective anti-fraud and corruption arrangements in place and taking appropriate action to improve these where required will assist the Council to use its available resources more effectively.

**9. Use of Appendices**

Appendix 1 – Fraud Response Plan  
Appendix 2 – Whistle blow Policy  
Appendix 3 – Sanctions Policy  
Appendix 4 – Anti Money Laundering Policy  
Appendix 5 – Anti Bribery Policy

**10. Local Government (Access to Information) Act 1985**

Not applicable.