



Report for:	Corporate Committee 24 September 2015	Item number	
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Title:	Corporate Anti-fraud and Corruption Policy and Strategy
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Report authorised by :	Assistant Director of Corporate Governance
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Lead Officer:	Anne Woods, Head of Audit and Risk Management Tel: 020 8489 5973 Email: anne.woods@haringey.gov.uk
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Ward(s) affected: ALL	Report for: Non-Key Decision
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1. Describe the issue under consideration

1.1 As part of the 2013 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. The Anti-fraud and Corruption Policy and Strategy was last presented to members at the Corporate Committee in June 2014 for formal approval.

2. Cabinet Member Introduction

2.1 Not applicable

3. Recommendations



Haringey Council

- 3.1 That the Corporate Committee reviews and approves the updated Corporate Anti-fraud and Corruption Policy and Strategy; together with the appended Fraud Response Plan, Whistle-blowing Policy, Sanctions Policy, Anti-money Laundering Policy and Anti-bribery Policy.

4. Other options considered

- 4.1 Not applicable.

5. Comments of the Chief Financial Officer and Financial Implications

- 5.1 There are no direct financial implications arising from this report. Investigations into allegations of fraud and corruption are undertaken using existing available resources within Audit and Risk Management and relevant service areas, where applicable.
- 5.2 The risks of fraud and any associated potential financial losses are identified and recorded in the Corporate Fraud risk register. Ensuring that the Council has dedicated fraud prevention and investigation resources assists in both reducing the risk of financial losses from occurring and in the recovery of resources from identified frauds.

6. Comments of the Assistant Director, Corporate Governance and Legal Implications

- 6.1 The Assistant Director, Corporate Governance has been consulted in the preparation of this report, and in noting that the policies and strategy follow legislative requirements / industry guidance and best practice has no comments.

7. Equalities and Community Cohesion Comments

- 7.1 This report outlines how the Council deals with allegations of fraud and corruption across all areas of the Council, which have an impact on various parts of the community. Improvements in managing risks and controls and reducing the opportunity for fraud will therefore improve services the Council provides to all sections of the community.

8. Head of Procurement Comments

- 8.1 Not applicable.

9. Policy Implications

- 9.1 There are no direct implications for the Council's existing policies, priorities and strategies. However, reducing the opportunity for fraud to take place in the first place, and taking appropriate action to detect and investigate identified fraud will assist the Council to use its available resources more effectively.

10. Use of Appendices

- 10.1 Annex 1 – Anti-fraud and Corruption Policy and Strategy



Fraud Response Plan
Whistleblowing Policy
Sanctions Policy
Anti-Money Laundering Policy
Anti-bribery Policy

11. The Anti-fraud and Corruption Policy and Strategy

- 11.1 The Council's Anti-fraud and Corruption Policy and Strategy gives guidance to relevant individuals, employees, Councillors, members of the public and organisations working in partnership with the Council, on what the Council wants to know about in relation to fraud and corruption, what people should do if they suspect fraud and corruption and how the Council will deal with any allegations made.
- 11.2 The Council's Anti-fraud and Corruption Policy and Strategy and the related appendices are published on the Haringey website and intranet site. 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.
- 11.3 The Assistant Director of Corporate Governance is identified as the responsible officer for maintaining the Anti-fraud and Corruption Policy, together with all related policies: Whistleblowing, Sanctions, Anti-Money Laundering and Anti-bribery. The Assistant Director of Corporate Governance and Head of Audit and Risk Management undertake annual reviews of all anti-fraud and corruption policies to ensure they reflect current legislation and recommended best practice.
- 11.4 The reviews of the Whistleblowing policy are undertaken in consultation with the Assistant Director for Human Resources to ensure that all relevant employment issues are incorporated into any changes to the policy. The review of the Whistleblowing policy undertaken in July 2015 was provided in advance to the Council's joint HR/Trade Union meeting on 15 July; and subsequently to the Statutory Officers Group (SOG) on 28 July for their review and comments. No changes to the policies were requested following these meetings; and the policies were re-circulated to the Trade Unions on 5 August following their approval by SOG, with a request that any comments be provided by 1 September. No comments were received.
- 11.5 The Sanctions Policy has been updated to reflect the introduction of the Department for Work and Pension's (DWP's) Single Fraud Investigation Service which took over responsibility for investigating all cases of suspected housing benefit fraud in Haringey with effect from 1 August 2015. Haringey Council no longer has any powers to investigate or prosecute cases which only involve housing benefit fraud. However, the Fraud Team will continue to work with the DWP to undertake joint prosecutions where benefit fraud is linked to other frauds e.g. council tax, tenancy and Right to



Buy. This will ensure that costs are minimised and the totality of the fraud is contained within a single prosecution.

- 11.6 No changes have been required to the Anti-Money Laundering or Anti-Bribery policies; as no new legislation or guidance has been issued since the last review in 2014. However, the Head of Audit and Risk Management is undertaking training during August and September 2015 with key services areas, including legal and finance, who undertake transactions where due diligence checks may be required. This will ensure that all relevant staff are aware of the checks required and the reporting arrangements if they suspect money laundering or bribery offences.
- 11.7 No changes to the main policy, or fraud response plan were required following this review.
- 11.8 Annual reminders to all staff on how to report suspected cases of fraud and corruption, together with contact details, are provided via corporate newsletters. This approach ensures that all staff are made aware of the Council's expectations and processes in relation to fraud and how to report it. The Head of Audit and Risk Management will be undertaking further awareness and training sessions across the organisation during 2015/16.
- 11.9 The Council's Anti-fraud and Corruption Policy and 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 whistle-blowing and governance matters.