

SUFFOLK COASTAL DISTRICT COUNCIL ANTI-THEFT, ANTI-FRAUD & ANTI-CORRUPTION POLICY

POLICY STATEMENT

- 1.1 Suffolk Coastal District Council is committed to providing the highest quality of service to all its residents and customers. The Council recognises that the services provided need to be cost-effective, efficient and fair and that occurrences of theft, fraud and corruption may effect the cost, efficiency and equity of our services.
- 1.2 The Council and each individual member of staff have the responsibility to counter theft, fraud and corruption and the duty to protect the assets of the Council. Assets include information held by the Council, professional image and goodwill as well as property and funds.
- 1.3 The Council is committed to maintaining an honest, open and well-intentioned environment in all its areas of operation. The Council will prevent theft, fraud and corruption by:
 - (a) Developing an anti-theft, anti-fraud and anti-corruption culture among staff and the public to deter such acts.
 - (b) Encouraging the reporting of reasonably held suspicions relating to theft, fraud or corruption within any area of the Council's operations.
 - (c) Designing and operating systems, procedures and policies which minimise the risk of fraud.
 - (d) Assisting other government bodies and law enforcement agencies in their investigations into theft, fraud and corruption where it is appropriate, lawful and proper to do so, and seek assistance from such organisations when the Council's own enquiries necessitate such measures.
- 1.4 Where appropriate, the Council will seek to prosecute persons who:
 - (a) operate corrupt practices against the Council or
 - (b) steal from the Council or
 - (c) defraud the Counciland will seek to recover the proceeds of any such activity from identified offenders.
- 1.5 The Council aims to treat people from all sectors of the community with dignity and respect and without discriminating unfairly on grounds of race, colour, religion, nationality, gender, age, sexual orientation, or disability. This applies to all its dealings with the public including the actions described in this document.
- 1.6 In compiling this document, the Council has taken the provisions of the Human Rights Act 1998 into account. In the Council's view, this document is compatible with Convention Rights.

THEFT, FRAUD AND CORRUPTION

- 2.1 The Council considers theft to be an intentional, dishonest and unlawful borrowing, misappropriation or misuse of the Council's assets or facilities. This definition includes actions that are contrary to Section 1 of the Theft Act 1968 as well as those that fall short of offences under criminal law.
- 2.2 The Council considers fraud to be any dishonest act or intent undertaken with a view for personal gain for oneself or another, or to sustain loss to another, which involves the appropriation, misappropriation or misuse of any asset or information held by or on behalf of the Council. This definition include actions that are commonly construed as offences under criminal law as well as those that fall short of offences under criminal law.
- 2.3 For the purposes of this document the term corruption means the offering, giving, soliciting or acceptance of an inducement or reward intended to influence the action of any Member or officer of the Council or contractor employed by, or on behalf of, the Council. Corruption may also be deemed to include criminal acts and situations where any Member or officer intentionally makes a decision which gives any person an advantage or disadvantage where the decision is contrary to the policy/procedures governing the decision making process and is based on no sound reasoning. The latter part of this definition is intended to encompass all types of discrimination, both positive (where any person gains an unfair advantage) and negative (where any person is unfairly disadvantaged).

SPECIFIC ACTIVITIES

- 3.1 The Council has an ethos of honesty and integrity. The specific activities detailed in this section are designed to maintain an honest culture and ensure that proper arrangements exist for the prevention and detection of theft, fraud and corruption. The Council will ensure that the following activities are undertaken:
 - (a) The widespread publication of the Authority's anti-theft, anti-fraud and anti-corruption Policy Statement as set out in Section 1 of this document.
 - (b) The provision of an adequate and effective internal audit service to carry out an on-going review of financial and other systems in use and to test those systems for weaknesses in internal controls. In carrying out this work internal audit will have regard to the relative risk associated with particular systems as agreed with the Council's external auditors.
 - (c) The regular review of the content and application of the Council's Standing Orders and Financial Regulations.
 - (d) The issuing of comprehensive Codes of Conduct to all employees and Members of the Council and, where appropriate, to contractors employed by or on behalf of the Council.
 - (e) The provision of theft, fraud and corruption training to officers and Members where appropriate.
 - (f) The maintenance of a whistleblowing policy document and related reporting procedures so that proper arrangements exist to ensure that there is no obstacle to reporting theft, fraud or corruption.
 - (g) The maintenance of a theft, fraud and corruption response plan to ensure that if any allegation is made regarding theft, fraud or corruption appropriate investigation takes place and appropriate steps are taken, if appropriate, to recover any loss incurred.

- (h) The prosecution of offenders where this is considered to be in the interests of the Council.
- (i) Full co-operation with any work undertaken or information requested by the Council's external auditors relating to matters of theft, fraud and corruption.
- (j) Appointing one of the Council's officers as a Compliance Officer for anti-fraud, anti-theft and anti-corruption issues to ensure that there is a clear point of contact for anyone wishing to report theft, fraud or corruption.

3.2 The arrangements made to implement the above shall have regard to relevant recommendations made by the:

- (a) Audit Commission
- (b) National Audit Office
- (c) Government Departments
- (d) The Council's External Auditors
- (e) The Chartered Institute of Public Finance & Accountancy
- (f) Benefit Fraud Inspectorate.

July 2000 Endorsed by Council

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