



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL



## Governance and Audit Committee


Tuesday, 16 July 2024

Report of Councillor Philip Knowles,  
Cabinet Member for Corporate  
Governance and Licensing

# Counter Fraud, Bribery, and Corruption Strategy 2024-26

### Report Author

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### Purpose of Report

One of the key areas for Governance and Audit Committee, as part of its terms of reference, is to monitor and review the counter fraud arrangements in place which includes approving the Counter Fraud, Bribery, and Corruption Strategy.

### Recommendations

**That the Committee approves the Counter Fraud, Bribery, and Corruption Strategy 2024-26 attached at Appendix A.**

### Decision Information

Does the report contain any  
exempt or confidential  
information not for publication?

No

What are the relevant corporate  
priorities?

Effective council

Which wards are impacted?

(All Wards);

# **1 Implications**

- 1.1 Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

## ***Finance and Procurement***

- 1.2 There are no specific financial implications arising from this report.

Completed by: Richard Wyles, Deputy Chief Executive and s151 Officer

## ***Legal and Governance***

- 1.3 There are no significant legal and governance implications arising from this report which are not already included in the body of the report.

Completed by: Graham Watts, Monitoring Officer

# **2 Background to the Report**

- 2.1 In accordance with the workplan of the Governance and Audit Committee, it is a requirement to approve the Counter Fraud, Bribery, and Corruption Strategy 2024-26. The Counter Fraud Framework was last considered on 26 January 2022 and is required to be reviewed every two years.

# **3 Summary of position**

- 3.1 The Council is committed to the highest standards of quality, probity, openness and accountability. As part of the Committee's terms of reference, counter fraud is one of the key areas of focus being an essential element of delivering good governance. To develop and promote greater awareness, and in line with best practice, a review of the Council's Counter Fraud Framework has been undertaken, culminating in this new Counter Fraud, Bribery, and Corruption Strategy 2024-26.
- 3.2 Like any organisation South Kesteven District Council is inherently vulnerable to the risk of fraud and corruption and, with reducing Government funding and the current economic position, it is vital that robust arrangements for the prevention and detection of fraud are maintained, and best use of information and knowledge is made in order to ensure effective fraud prevention procedures are in place.
- 3.3 Good governance is essential in the public sector to meet legal requirements and to uphold public expectations that we will make good use of resources. The Accounts and Audit Regulations 2015 requires authorities to implement measures to enable the prevention and detection of inaccuracies and fraud.
- 3.4 The Counter Fraud Framework has been reviewed and the Whistleblowing Policy and Anti-Money Laundering Policy appendices removed as these should be standalone policies as they may cover things that are not related to fraud – those

two policies were reviewed and approved by Governance and Audit Committee on 19 June 2024.

- 3.5 The Fraud Response Plan has also been separated from the Framework as it is not appropriate to have that document in the public domain – this remains an internal guidance document.

## **4 Counter Fraud, Bribery, and Corruption Strategy**

- 4.1 The Council's Counter Fraud, Bribery, and Corruption Strategy 2024-26 aligns to [Fighting Fraud and Corruption Locally \(FFCL\) 2020: A strategy for the 2020s](#), the counter fraud and corruption strategy for local government, which is endorsed by a range of organisations including the Local Government Association, CIPFA Counter Fraud Centre, SOLACE, and counter fraud experts from numerous English local authorities.

- 4.2 The Council's Counter Fraud, Bribery, and Corruption Strategy 2024-26 is aligned to the FFCL's pillars of activity:

- **Govern**
  - Having robust arrangements and executive support to ensure anti-fraud, bribery, and corruption measures are embedded throughout the organisation. Having a holistic approach to tackling fraud is part of good governance.
- **Acknowledge**
  - Acknowledging and understanding fraud risks and committing support and resource to tackling fraud in order to maintain a robust anti-fraud response.
- **Prevent**
  - Preventing and detecting more fraud by making better use of information and technology, enhancing fraud controls and processes and developing a more effective anti-fraud culture.
- **Pursue**
  - Punishing fraudsters and recovering losses by prioritising the use of civil sanctions, developing capability and capacity to investigate fraudsters and developing a more collaborative and supportive local enforcement response. Local authorities have achieved success by following this approach; however, they now need to respond to an increased threat and protect themselves and the community. The second new area that has appeared during the research recognises the increased risks to victims and the local community.
- **Protect**
  - Protecting against serious and organised crime, protecting individuals from becoming victims of crime and protecting against the harm that fraud can do to the community. For a local authority this will also cover protecting

public funds, protecting its organisation from fraud and cybercrime and also protecting itself from future frauds.

- 4.3 The Counter Fraud Strategy explains how the Council will respond to the pillars of activity and identifies key priorities for 2024-26 under those pillars.

## **5 Key Considerations**

- 5.1 The Committee should monitor and review the counter fraud, bribery, and corruption arrangements currently in place and the activities that are being undertaken to mitigate those risks.

## **6 Reasons for the Recommendations**

- 6.1 Governance and Audit Committee, as part of its terms of reference, 9.1 (xx) should monitor and review the counter fraud arrangements currently in place and the activities that are being undertaken to mitigate those risks.

## **7 Appendices**

- 7.1 Appendix A – Counter Fraud, Bribery, and Corruption Strategy 2024-26