

Counter Fraud, Bribery, and Corruption Strategy

2024-26



SOUTH
KESTEVEN
DISTRICT
COUNCIL

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Introduction

South Kesteven District Council has adopted a stance of zero tolerance to all forms of fraud, bribery, and corruption.

The aim of this strategy is to provide an effective framework to protect Council resources from fraud and corruption.

The Corporate Plan

The Council's [Corporate Plan](#) sets out the Council's vision to be 'A thriving District to live in, work and visit'.

The Corporate Plan has identified five key priorities for the Council:

1. Connecting Communities
2. Sustainable South Kesteven
3. Enabling Economic Opportunity
4. Housing
5. Effective Council

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.

Having a holistic approach to tackling fraud is part of good governance to minimise risks of fraud losses and financial irregularity against the Council. This means public money can be used for delivering the Council's priorities.

This strategy supports the Council's Corporate Plan, vision, and key priorities. It will support the Council to provide good value services for local residents and communities.

Our vision

We will protect South Kesteven District Council's resources from fraud and corruption. We have a culture where Officers are accountable for their actions and are empowered to make decisions so that fraud, bribery, and corruption risks are managed. There is a zero tolerance to all forms of fraud, bribery, and corruption.

Outcomes

We aim to:

- identify fraud risks as part of our management arrangements and evaluate what this means for the Council including any new and emerging risks
- ensure our Members and Officers have awareness of fraud, bribery, and corruption risks, their impacts and what the Council does to minimise these risks
- ensure our counter fraud, anti-bribery, and anti-corruption measures are proportionate to risks
- develop and maintain a culture where Officers and Members are accountable for their actions
- help our Officers to feel empowered to make decisions so that fraud, bribery, and corruption risks are managed well
- ensure effective internal control measures are in place to make it more difficult for fraud and error to occur
- demonstrate that the Council has taken steps to achieve fraud savings and recoveries including sanctions where appropriate
- protect the wider public purse through strategic partnerships
- continue to deliver a best practice response meeting professional guidance and responding to any changes in legislation

Making it happen: Our response to fraud

We acknowledge that there are inherent risks of fraud, bribery, and corruption against the Council. Strong governance and an ethical culture can build resilience against these risks.

We are clear on our vision to protect our resources from risks of fraud and corruption.

South Kesteven District Council will continue to take a zero-tolerance stance to all forms of fraud, bribery, and corruption.

To help us deliver our vision, we have aligned our strategy and local response to national best practice. [Fighting Fraud and Corruption Locally](#) (FFCL) provides a national strategy in response to economic crime and fraud.

FFCL 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.

Our response follows five pillars of activity:

Govern	Acknowledge	Prevent	Pursue	Protect
<ul style="list-style-type: none"> ■ Maintain robust arrangements and executive support to ensure counter fraud, bribery, and corruption measures are embedded throughout the Council 	<ul style="list-style-type: none"> ■ Assess and understand fraud, bribery, and corruption risks ■ Commit the right support to tackling fraud, bribery, and corruption ■ Demonstrate a robust counter ■ fraud, bribery, and corruption response ■ Communicate risks and response 	<ul style="list-style-type: none"> ■ Develop an effective counter fraud, bribery, and corruption culture ■ Enhance fraud, bribery, and corruption controls and processes ■ Make best use of information and technology ■ Communicate activity and successes 	<ul style="list-style-type: none"> ■ Investigate and prioritise fraud recovery sanctions, and punishment of offenders ■ Collaborate with strategic partners ■ Lesson learning and closing the gaps ■ Member and Officer training 	<ul style="list-style-type: none"> ■ Recognise the harm that fraud, bribery, and corruption can cause in the community ■ Protect the Council and its residents from fraud, bribery, and corruption

Our response to fraud, bribery, and corruption will be:

- Risk based following an assessment of fraud, bribery, and corruption risks
- Proportionate to risks faced
- Completed with due diligence
- Communicated
- Monitored and reviewed

Govern

The Council's Constitution sets out how the Council operates and how decisions are made. This includes a commitment to counter-fraud and anti-corruption:

“There is an expectation and requirement that all Members, Officers, consultants, contractors, and service users be fair, honest and act with the utmost of integrity at all times.

The Council is resolute that the culture and tone of the Authority is one of honesty and opposition to fraud and corruption.

There is an expectation and requirement that all individuals, businesses and organisations dealing in any way with the Council will act with high standards of probity, openness and integrity and that Council Officers or its agent(s) at all levels will lead by example in these matters.

The Council's Codes of Conduct for Members and Officers set out approaches to work that are honest, fair, accountable and, as far as possible, transparent.

Members and Officers must act in line with the codes at all times”.

The Governance and Audit Committee is charged with monitoring the effectiveness of the Council's Financial Regulations, Contract Procedure Rules, Codes of Conduct, Whistleblowing Policy, Anti-Money Laundering Policy, and the Counter Fraud Strategy.

The Cabinet Member for Corporate Governance and Licensing has specific responsibility for all areas of Governance, which includes fraud, bribery, and corruption.

We have also embedded counter fraud, bribery, and corruption arrangements throughout our other policies, risk management arrangements and systems of internal control. These include:

- Risk Management Framework
- Officer and Member Codes of Conduct – including rules on avoiding and stopping conflicts of interest
- Conflict of Interest Register
- Financial Regulations
- Information Security Policy and Acceptable Use of ICT Assets Policy

This is supported across the wider governance framework. Arrangements to prevent fraud, bribery, and corruption can be found in other policies and guidance documents. For example:

- Contract Procedure Rules
- Recruitment policies (verification of Officer identity)
- Disciplinary Policy
- Safer Lincolnshire Handbook (strategic response to tackling fraud as part of serious organised crime)

This list is not exhaustive but demonstrates how our arrangements are holistically designed to support and embed a counter fraud, bribery, and corruption culture.

Acknowledge

The Council recognises the inherent risk of fraud, bribery, and corruption against public money.

Horizon scanning: fraud risk assessment

It is important the Council understands its exposure to fraud as part of risk management arrangements.

The Section 151 Officer is responsible for communicating fraud risks and responses in annual reports to the Governance and Audit Committee. This will include an annual counter fraud report summarising what work has been delivered and the effectiveness of counter fraud arrangements.

Fraud threats constantly evolve, so our response to fraud will be agile. We will respond in a proportionate manner, and where necessary make use of additional external resource. For example, our internal auditors and other specialist counter fraud professionals.

Fraud control in emergency management

During emergency times, the Council's usual internal controls may need to change rapidly. Fraud risks may be heightened as fraudsters seek to exploit vulnerabilities and weak spots in temporary arrangements. During emergency times, we will apply the overarching principles:

- Acknowledge and accept risks are higher than normal
- Integration of fraud control resources in process design
- Implementation of control measures
- Carry out targeted post-event assurance work
- Control framework re-assessment following move following recovery

Prevent and pursue

Fraud, bribery, and corruption are unacceptable, and prevention is everyone's responsibility.

Our governance arrangements provide a framework for an anti-fraud culture. The Section 151 Officer will ensure we translate this high-level Strategy and our policies into action.

We will:

- communicate our zero-tolerance stance to fraud, bribery, and corruption, and action we have taken
- raise fraud, bribery, and corruption awareness – our policies, spotting risks, knowing how to act and publishing actions taken against fraudsters
- work with our internal auditors to ensure there are robust systems of risk based internal control to manage risks found in our fraud risk assessment
- explore opportunities for use of technology, such as data matching
- collaborate strategically including participation in the National Fraud Initiative exercise
- promote the whistleblowing facility as an option for reporting fraud concerns
- ensure reports of fraud are actioned and investigated
- take steps for sanctions and redress following fraud incidents
- address lessons learnt following incidents of fraud, bribery, or corruption

To help with this, the Council has a qualified Accredited Counter Fraud Specialist and access to additional specialist resource if required. This will be used to:

- develop and deliver an effective coordinated fraud, bribery, and corruption awareness programme
- deliver savings and achieve outcomes which will reduce fraud
- share intelligence, access investigative resource, expertise, and best practice

Plans will be reviewed so that the Council can respond to current and emerging risks where they are cross-cutting with other councils.

Preventing bribery and corruption

We will ensure arrangements are embedded throughout policies and governance arrangements to prevent bribery and corruption.

Specific guidance on how to conduct business through contract negotiations are included in the Contract Procedure Rules, and suppliers and partners are expected to comply with Council policies when delivering goods and services on behalf of the Council.

There are clear rules in the Codes of Conduct for Officers and Members about accepting gifts, hospitality, or donations. Risks of bribery and corruption will be included in fraud risk assessments.

Reporting concerns

Our Whistleblowing Policy sets out what should be reported and how you can do this. Contact details for reporting concerns are included within this policy. Resources are available to maintain our whistleblowing arrangements.

Investigation

The Counter Fraud Strategy is supported by a Fraud Response Plan which explains what to do

if you suspect fraud or corruption and how we will deal with fraud concerns when they are reported.

The Fraud Response Plan sets out our intent to investigate and, where fraud is found, to apply sanctions and seek redress. We will ensure investigation resource is made available to follow up fraud concerns.

Protect

Our actions to prevent and pursue fraud, bribery, and corruption against the Council are designed to protect Council resources. We recognise fraud, bribery, and corruption can also cause harm in the wider community and we will work in collaboration with our strategic partners to protect both the Council and its residents from such risks.

South Kesteven District Council is one of the partner organisations of the Safer Lincolnshire Partnership (SLP). The SLP is the single multi-agency forum for addressing community safety issues across Lincolnshire.

The SLP has identified tackling serious organised crime as a strategic priority. This includes fraud. Their current work is focused on preventing fraud and scams against members of the public, and ensuring individual victims are supported.

Reporting advice and support

To avoid potentially contaminating the evidence, managers should not investigate themselves and instead immediately report all suspicions of fraud or corruption to the Statutory Officers Group:

Karen Bradford – Chief Executive

karen.bradford@southkesteven.gov.uk

Richard Wyles – Deputy Chief Executive and Section 151 Officer

richard.wyles@southkesteven.gov.uk

Graham Watts – Monitoring Officer





graham.watts@southkesteven.gov.uk

We will treat all concerns or suspicions with discretion and in confidence. Our Fraud Response Plan sets out how to report concerns and how we will handle reports.

Whistleblowing facility:

[Report Fraud Online](#) or email: reportfraud@southkesteven.gov.uk

Definitions

<p>Fraud</p> 	<p>Fraud is a deception which is deliberate and intended to provide a direct or indirect personal gain.</p> <p>The term fraud can include criminal deception, forgery, blackmail, corruption, theft, conspiracy or the covering up of material facts and collusion. By using deception a fraudster can obtain an advantage, avoid an obligation, or cause loss to another party.</p>
<p>Bribery</p> 	<p>Bribery is the offering, promising, or giving of something to influence an official.</p> <p>This can include payments to get a faster or better service or to gain advantage in public procurement processes; offering, providing or receiving gifts, entertainment, and hospitality or other items of value such as donations or sponsorships; and levels of hospitality disproportionate to a business transaction.</p>
<p>Corruption</p> 	<p>Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity or standards of professional behaviour.</p> <p>This can include the abuse of the power given to an individual by another person or organisation; activity that's beyond the position or remit of a person; and benefits taken for an employee's personal gain, rather than for their organisation.</p>
<p>Theft</p> 	<p>A person is guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it; and theft and steal shall be construed accordingly.</p> <p>The Council will report all theft to the police for investigation.</p>

Stakeholder and responsibilities

Stakeholder	Responsibilities
Chief Executive	<ul style="list-style-type: none"> ■ Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud, bribery, and corruption
Deputy Chief Executive and Section 151 Officer	<ul style="list-style-type: none"> ■ Develop and maintain the Counter Fraud, Bribery, and Corruption Strategy, supported and approved by the Governance and Audit Committee
Monitoring Officer	<ul style="list-style-type: none"> ■ Advise Members and Officers on ethical issues, standards and powers to ensure that the Council operates within the law and statutory Codes of Practice
Governance and Audit Committee	<ul style="list-style-type: none"> ■ Review the assessment of fraud, bribery, and corruption risks and potential harm to the Council from those risks ■ Monitor the effectiveness of the Council's Financial Regulations, Contract Procedure Rules and other policies for counter fraud, bribery, and corruption ■ Promote high standards of conduct amongst Officers and Members
Members	<ul style="list-style-type: none"> ■ Support and promote the development of a strong counter fraud culture
External Audit	<ul style="list-style-type: none"> ■ Subject to the concept of materiality, provides reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or other irregularity
Deputy Chief Executive and Section 151 Officer Accredited Counter Fraud Specialist	<ul style="list-style-type: none"> ■ Report significant matters of fraud or financial irregularity to the Head of Paid Service (Chief Executive), the Executive and the Governance and Audit Committee ■ Develop and implement the Counter Fraud, Bribery, and Corruption Strategy and promptly investigate cases of suspected fraud ■ Make recommendations to improve controls and reduce the risk of fraud in the future ■ Ensure that where fraud is found proportionate action is taken for sanctions and redress
Directors	<ul style="list-style-type: none"> ■ Ensure that the Counter Fraud, Bribery, and Corruption Strategy is adhered to and that the risk of fraud, bribery, and corruption are assessed reducing risks by implementing strong internal controls ■ To report all suspected fraud or financial irregularity in accordance with the Fraud Response Plan
Heads of Service	<ul style="list-style-type: none"> ■ Promote Officer awareness ■ Refer all suspected fraud in accordance with the Fraud Response Plan and apply the policy of zero tolerance ■ Ensure assessment of the risk of fraud, bribery, and corruption in their service area and reduce these risks by implementing strong internal controls
Officers	<ul style="list-style-type: none"> ■ Comply with Council policies and procedures, to be aware of the possibility of fraud, bribery, and corruption, and to report any genuine concerns to management, Statutory Officers Group, the Accredited Counter Fraud Specialist, or via the whistleblowing arrangements
Public, Partners, Suppliers, Contractors, and Consultants	<ul style="list-style-type: none"> ■ Be aware of the possibility of fraud and corruption against the Council and report any genuine concerns/suspicions

Key priorities for 2024-26

Govern

- Deliver mandatory fraud awareness learning for all Council staff and Elected Members
- Implement a Counter Fraud Strategy
- Undertake an assessment against the Fighting Fraud and Corruption Locally Checklist

Acknowledge

- Develop a detailed fraud risk assessment in conjunction with service areas
- Review available counter fraud resources to ensure they are being utilised to maximum effect

Prevent and Pursue

- Improve publicity by refreshing information on internal and external websites, ensuring regular communication of fraud risks and improved use of social media
- Develop and enhance relationships with enforcement partners and local authority neighbours
- Improve and formalise internal control work with internal audit
- Consider innovative projects around data sharing eg NFI
- Review the benefits of fraud forums and benchmarking groups

Pursue

- Develop a targeted proactive programme of activity based on identified risks
- Consider how best to prioritise fraud recovery
- Develop a programme of closer working eg with DWP, Police etc

Protect

- Further develop the Fraud Response Plan which provides guidance to employees, managers, and the public, defining responsibilities for action in the event of suspected fraud

Our strategy on a page

Our vision

Working together to understand, find and prevent fraud, bribery, and corruption within South Kesteven

Our purpose

To protect South Kesteven District Council from fraud, bribery, and corruption

We achieve this by:

- Creating a culture where fraud, bribery, and corruption are unacceptable
- Raising awareness internally and externally to deter fraudsters
- Assessing fraud, bribery, and corruption risks ensuring control measures are appropriate
- Deploying appropriate resources to deal with the level of risk identified
- Ensuring resources for tackling fraud, bribery, and corruption have the appropriate skills and competence
- Working together with colleagues, other local authorities and agencies, sharing resources, skills, learning and best practice

Our values

The values of the Council determine how we behave and deliver services to residents and businesses and how we interact with each other. They are the 'true north' that underpins the culture of #TEAMSK:



Our strategic priorities

Connecting Communities

Sustainable South Kesteven

Enabling Economic Opportunity

Housing

Effective Council

How we deliver

Fraud Risk Assessment

Effective Internal Control Measures

Fraud Awareness Training

Partnership Counter Fraud Working

Targeted Fraud Prevention

Contact Details

**Alternative formats are available on request:
audio, large print and Braille**

**South Kesteven District Council
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 www.southkesteven.gov.uk



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