

FULL COUNCIL REPORT

Date Written	3 rd March 2022
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Service Area	Internal Audit
Exempt/Non Exempt	Non Exempt
Committee Date	30 th March 2022

To: Mayor, Ladies and Gentlemen

Anti-Fraud, Bribery & Corruption Policy and Counter Fraud Strategy & Framework 2021/22 to 2024/25

1.0 SUMMARY OF THE REPORT

1.1 To provide Council with the draft Anti-Fraud, Bribery & Corruption Policy and draft Counter Fraud Strategy and Framework 2021/22 to 2024/25 for consideration.

2.0 RECOMMENDATIONS that

2.1 The Council's Anti-Fraud, Bribery & Corruption Policy be approved.

2.2 The Council's Counter Fraud Strategy and Framework 2021/22 to 2024/25 be approved.

3.0 INTRODUCTION AND BACKGROUND

3.1 The Council's Counter Fraud Framework and related policies have been in existence for a considerable period of time and it has been recognised they were in need of updating.

3.2 In July 2020 Audit Wales produced a report entitled 'Raising Our Game - Tackling Fraud in Wales'. The report identified seven key themes that all public bodies needed to focus on in raising their game to tackle fraud more effectively and made 15 recommendations across the themes.

3.3 The updated draft Anti-Fraud, Bribery & Corruption Policy and new draft Counter Fraud Strategy and Framework 2021/22 to 2024/25 therefore considers this report and provides a strategy which identifies roles and responsibilities, aims and objectives, fraud risks, an action plan and a fraud response plan flowchart.

4.0 CURRENT SITUATION/PROPOSAL

4.1 The updated draft Anti-Fraud, Bribery & Corruption Policy is attached at Appendix 1 and includes sections on Policy Statement, who the policy applies to, definitions, responsibilities, Prevention, Detection and Investigation and deterrence.

4.2 The new draft Counter Fraud Strategy and Framework 2021/22 to 2024/25 at Appendix 2 outlines the aims and objectives of the strategy, identifies fraud risks and includes a 3-year action plan which will further improve the Council's resilience to fraud, bribery and corruption. The report includes measures of success and a flow chart to demonstrate the Council's approach to a suspected fraud. Both documents have already been considered by the Corporate Management Team. The Governance & Audit Committee also discussed both documents on 10th January 2022 and provided comments.

4.3 Following this Strategy, key policies such as the Anti-Money Laundering Policy and an Anti-Tax Evasion policy will be updated which will drive the commitment to developing a culture of honesty, integrity and opposition to fraud, corruption and bribery.

4.4 Council has recently agreed funding of an Investigations Officer. The appointment of an individual into this role will be key to fully implementing the policy and the strategy. Shortlisting has taken place and interviews are currently being arranged.

5.0 FINANCIAL IMPLICATIONS

5.1 The implementation of the policy and strategy will reduce costs and save the Council thousands of pounds, but it is difficult to estimate the value. Savings will be reported to the Governance & Audit Committee in due course.

6.0 INTEGRATED IMPACT ASSESSMENT

6.1

	Positive Impacts	Negative Impacts	Neutral/Not Applicable
1. Merthyr Tydfil Well-being Objectives	4 of 4	0 of 4	0 of 4
2. Sustainable Development Principles - How have you considered the five ways of working? <ul style="list-style-type: none"> • Long term • Prevention • Integration • Collaboration • Involvement 	5 of 5	0 of 5	0 of 5

3. Protected Characteristics (including Welsh Language)	0 of 10	0 of 10	10 of 10
4. Socio-economic Disadvantage	6 of 6	0 of 6	0 of 6
5. Consultation and Engagement	Undertaken	Due to be Undertaken	Not Required
	0 of 1	0 of 1	1 of 1
6. Data and Evidence to inform the proposal	Yes		No
	1 of 1		0 of 1
7. Biodiversity and the resilience of Ecosystems	Maintained	Enhanced	Reduced
	0 of 1	0 of 1	0 of 1
Summary			
The main positive impacts are:	The main positive impacts are that the Anti-Fraud, Bribery and Corruption Policy and Counter Fraud Strategy and Framework 2021/22 to 2024/25 supports the Council to achieve its Well-being Objectives through improved management of its financial resources assisted by its Counter Fraud arrangements.		
The main negative impacts are:	No negative impacts have been identified.		

ELLIS COOPER
CHIEF EXECUTIVE

COUNCILLOR CHRIS DAVIES
CABINET MEMBER FOR GOVERNANCE
AND CORPORATE SERVICES

BACKGROUND PAPERS		
Title of Document(s)	Document(s) Date	Document Location
Does the report contain any issue that may impact the Council's Constitution?		No

Consultation has been undertaken with the Corporate Management Team in respect of each proposal(s) and recommendation(s) set out in this report.