

LONDON BOROUGH OF CROYDON

REPORT:	AUDIT & GOVERNANCE COMMITTEE	
DATE OF DECISION	14 March 2024	
REPORT TITLE:	Anti-Fraud & Corruption Strategy	
CORPORATE DIRECTOR / DIRECTOR:	Jane West Corporate Director Resources	
LEAD OFFICER:	Malcolm Davies, Head of Anti Fraud, Risk & Insurance, Email: malcolm.davies@croydon.gov.uk	
LEAD MEMBER:	Councillor Jason Cummings, Cabinet Member for Finance	
KEY DECISION?	No	
CONTAINS EXEMPT INFORMATION? <i>(* See guidance)</i>	NO	Public
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1 As part of the Audit & Governance Committee’s role of overseeing the anti-fraud and corruption strategy Members are asked to review and approve the contents of Croydon’s refreshed Anti-Fraud & Corruption Strategy.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices the Audit & Governance Committee are recommended:

- 2.1 To approve Croydon’s refreshed Anti-Fraud & Corruption Strategy.

3 REASONS FOR RECOMMENDATIONS

- 3.1** The Anti-fraud and Corruption Policy was last reviewed by Members at General Purposes & Audit committee 25 November 2021. In line with Croydon's overall review of its governance arrangements a refreshed Anti-fraud and Corruption Strategy is now due for a review by this committee

4 BACKGROUND AND DETAILS

- 4.1** The refreshed strategy has been updated to reflect the establishment of the Counter Fraud Shared Service, with the London Borough of Lambeth, since the strategy was last considered by Members and in particular the greater emphasis on fraud prevention.
- 4.2** *The strategy cross-references with other refreshed and revised policies and strategies of the council including the Members' Code of Conduct; Officers' Code of Conduct; Whistle-blowing Policy; Financial Regulations and Contract and Tender Regulations and a further reference to the Nolan Principles of public life.*
- 4.3** In particular it should be noted that the 'five pronged' approach to tackling fraud: 'govern, acknowledge, prevent, pursue and protect' specifically references a risk management approach to tackling fraud with a fraud risk register as a starting point to understanding the Council's exposures.
- 4.4** It is recognised that tackling fraud and corruption requires everyone associated with the council to play their part and the strategy specifically references those corporate responsibilities along with the role of officers and members, contractors internal audit and lastly the counter fraud shared service respectively.
- 4.5** In line with the Council's commitment to openness and transparency, this report will appear in Part A of the agenda unless, in accordance with the Access to Information Procedure Rules in the Council's Constitution there is specific justification for any individual item being considered under Part B (set out under Paragraph 3 of Schedule 12A of the Local Government Act 1972 as amended).
- 4.6** It should be noted that some of the grounds for exemption from public access are absolute. However, for others such as that in para.3, 'Information relating to the financial or business affairs of any particular person (including the authority holding that information)', deciding in which part of the agenda they will appear, is subject to the further test of whether, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** N/A

6 CONSULTATION

6.1 N/A

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 Getting our finances right and making the council financially sustainable.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 Finance have been consulted and can confirm there are no additional financial considerations arising from this report.

8.1.2 Comments approved by Lesley Shields, Head of Finance for Assistant Chief Executive and Resources on behalf of the Director of Finance. 15/02/2024

8.1.3 Revenue and Capital consequences of report recommendation

N/A

8.2 LEGAL IMPLICATIONS

8.2.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance & Monitoring Officer that the the Corporate Director of Resources has a statutory responsibility under the Local Government Act 1972 section 151 to make arrangements for the proper administration of the Council's financial affairs. These include the prevention, detection and investigation of fraud and corruption and where appropriate, the prosecution of offenders.

8.2.2 The Council also has a duty under the Crime and Disorder Act 1998 section 17 to do all it can to prevent crime and disorder.

8.2.3 This Policy is part of the Council's framework of policies designed to support the Council with complying with these responsibilities to minimise losses due to fraud and corruption.

8.2.4 Comments approved by the Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law & Monitoring Officer 14/02/2024

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 As referenced in the Council's standard terms and conditions (T&Cs) of employment, all employees are required to familiarise themselves with and abide by the Code of Conduct for Council staff which sets out expected standards of behaviour. The Code of Conduct includes reference to the mechanisms through which staff can raise actual or suspected fraud. The standard T&Cs includes a clause on Benefit Fraud and Debt, outlining that it is a disciplinary offence to be in receipt of Council and/or state benefits to which the employee is not entitled.

8.3.2 There are no other Human Resources implications arising from this report, however, should any matters arise these will be managed through the Council's HR policies and procedures.

8.3.3 Approved by: Gillian Bevan, Head of Human Resources on behalf of Chief People Officer 13/2/2024

9. APPENDICES

9.1 Anti-Fraud & Corruption Strategy

10. BACKGROUND DOCUMENTS

10.1 None

11. URGENCY

11.1 N/A