

<b>REPORT TO:</b>	<b>GENERAL PURPOSES AND AUDIT COMMITTEE</b>  <b>25.11.2021</b>
<b>SUBJECT:</b>	<b>Anti-Fraud &amp; Corruption Strategy</b>
<b>LEAD OFFICER:</b>	<b>Richard Ennis Interim Corporate Director Resources (S151 &amp; Deputy Chief Executive)</b>
<b>CABINET MEMBER</b>	<b>Councillor Callton Young, Cabinet Member for Resources &amp; Financial Governance</b>
<b>WARDS:</b>	<b>All</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b>	
As part of the General Purposes and Audit 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.	
In line with the Council's commitment to openness and transparency, Anti-Fraud & Corruption Strategy report will appear in Part A of the agenda unless there is specific justification for any individual entries being considered under Part B (set out under Paragraph 3 of Schedule 12A of the Local Government Act 1972 as amended).	
<b>FINANCIAL SUMMARY:</b> No additional direct financial implications.	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.:</b> N/A	

<p><b>1.1 RECOMMENDATIONS</b></p> <p>The Committee is asked to:</p> <p>Review and approve the contents of Croydon's refreshed Anti-Fraud &amp; Corruption Strategy.</p>
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## **2. EXECUTIVE SUMMARY**

- 2.1 The report requests Members of the General Purposes & Audit Committee to review and approve Croydon's refreshed Anti-Fraud & Corruption Strategy.

### **3. DETAIL**

#### **Anti-Fraud & Corruption Strategy**

- 3.1 The Anti-fraud and Corruption Policy was last reviewed by Members at General Purposes & Audit committee 6 December 2018. In line with Croydon's overall review of its governance arrangements a refreshed Anti-fraud and Corruption Strategy is presented for review by this committee.
- 3.2 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.
- 3.3 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.
- 3.4 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 and lastly the internal audit and corporate antifraud functions.
- 3.5 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).
- 3.6 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.

### **4. FINANCIAL CONSIDERATIONS**

- 4.1 There are no additional financial considerations arising from this report.

(Approved by Nish Popat Interim Head of Finance Resources on behalf of Interim Director of Finance)

## **5. LEGAL CONSIDERATIONS**

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance and Deputy Monitoring Officer that the the Corporate Director of Resources and Chief Finance Officer 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.
- 5.2 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.
- 5.3 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.

*Approved by:* Sandra Herbert, Head of Litigation and Corporate Law on behalf of the interim Director of Law and Governance and Deputy Monitoring Officer.

## **6. HUMAN RESOURCES IMPACT**

- 6.1 There are no additional Human Resources implications arising from this report.

(Approved by: Gillian Bevan, Head of Human Resources on behalf of the Interim Director of HR)

## **7. EQUALITIES, ENVIRONMENTAL AND CRIME AND DISORDER REDUCTION IMPACTS**

- 7.1 None

## **8. RISK ASSESSMENT**

- 8.1 No further risk issues other than those detailed in the report.

## **9. FREEDOM OF INFORMATION/DATA PROTECTION CONSIDERATIONS**

- 9.1 Information contained in this report may be accessible under the Freedom of Information Act subject to the application of any relevant exemptions, such as commercial sensitivity and whether disclosure was in the 'public interest'.

None

## **10. DATA PROTECTION IMPLICATIONS**

None

**10.1. WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

No.

No personal data is processed as part of the production of this strategy.

**10.2. HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

No.

Not applicable as no personal data is processed as part of the production of the Corporate Risk Register

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**CONTACT OFFICER:**

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**BACKGROUND DOCUMENTS:**

Appendix 1 Anti-Fraud & Corruption Strategy